

From: [John V. Fox](#)
To: [SR 520 DEIS Comments;](#)
CC: [Ziegler, Jennifer; tim.ceis@seattle.gov; sally.clark@seattle.gov; richard.conlin@seattle.gov; david.della@seattle.gov; jan.drago@seattle.gov; jean.godden@seattle.gov; nick.licata@seattle.gov; richard.mciver@seattle.gov; tom.rasmussen@seattle.gov; peter.steinbrueck@seattle.gov;](#)
Subject: Our comments on the SR520 DEIS - please review and include - and say "NO" to Pacific Street Interchange Option
Date: Tuesday, October 31, 2006 11:34:59 AM
Attachments:

Comments on DEIS for 520 from the Seattle Displacement Coalition

October 31, 2006

Paul Krueger WSDOT
414 Olive Way, Suite 400
Seattle, WA 98101

Re: Comments on the SR520 DEIS

The Seattle Displacement Coalition is a 29 year-old city-wide coalition of community, housing, church, and social service organizations committed to the preservation and expansion of low income housing opportunities here in Seattle. We also have assisted numerous neighborhood groups over the years responding to public and private developments that threaten both the physical and social character of those areas. Our organization is responding to this specific transportation issue - SR520 expansion - because all six-lane alternatives especially the Pacific Interchange Option pose such a significant danger to Seattle's neighborhoods - their liveability and affordability.

c-019-001 | We simply cannot afford to move forward with any of these six lane options given the significant unavoidable adverse impacts that accompany each of them - especially the Pacific Interchange option that will so threaten valuable wetlands, create extraordinary unmitigated noise and visual blight, air pollution, and spill a level of traffic into the University District that cannot be reasonably managed or

c-019-001 | mitigated. Gridlock will be the inevitable result. The DEIS fails to adequately consider these direct, indirect, and cumulative impacts associated with any of the six lane alternatives. It also fails to give full consideration to the broad range of four lane alternatives that when coupled with bike, transit, TDM, and other mitigation measures could reasonably address traffic demand along 520 for decades to come.

c-019-002 | At the core of this debate over options for 520 is a rather fundamental issue - the six lane options and their designs especially the Pacific Street Interchange are all geared not simply to absorb manageable and reasonable levels of growth (while trying to help shift more commuters from cars to buses and other modes) through that corridor, they are consciously designed to accommodate expanded and accelerated rates of growth both on the Eastside and in downtown Seattle.

The growth first - pro-density- pro-displacement crowd - see expansion of 520, a waterfront tunnel, mercer expansion, all these so called improvements as necessary in order to feed the downtown highrise growth machine which is not sustainable either in terms of Seattle or the region's ability to accommodate it - not without enormous unavoidable impacts on affordability of our housing and our city and region's physical environment. Our city cannot add enough housing to accompany the runaway growth and that translates into ever escalating housing costs and displacement. More is better....it fuels growth... more office space and bio-tech in downtown - feeds our property values - feeds our wallets - and feeds the gentrification displacement beast that is destroying our city and increasing the ranks of the homeless and driving up housing cost for all of us.

Further, when half the new downtown office workers choose to live on the eastside - they will continue to demand more and more freeway lanes such as the six lane 520 options to get them into downtown. The cost of moving this increasing number of commuters who live farther and farther out on the Eastside to and from their jobs in downtown is enormous and simply unsustainable. Nor can we afford a regional growth model premised on downtown Seattle continuing to absorb 60 percent of the regions office growth. Expanding 520 to six lanes merely fuels these unsustainable trends. The DEIS gives no consideration to these population, land use, and housing effects. Nor does the DEIS give consideration of other regional growth models such as a poly-centered approach to growth that would more evenly distribute growth among all activity centers in the region thereby obviating the need for more freeway lanes and dovetailing with more cost effective and environmentally sensitive approaches for 520.

c-019-002 | We cannot afford the cost of adding these freeway lanes in terms of real dollars and more importantly we cannot afford the devastating impacts that will result on our neighborhoods - as is evidenced by the extraordinary and outrageous intrusion the Pacific Street Interchange option will have on our wetlands and our neighborhoods. It translates directly into a level of noise, visual, air pollution that cannot be mitigated and will significantly reduce our quality of life. And it increase and only fuels our dependency on the automobile. The 520 DEIS fails to give any consideration to these longterm and cumulative effects.

c-019-003 | In closing, our members that represent neighborhoods from across this city categorically reject the six lane options especially the Pacific Street option. We urge you to do your job and fully assess the negative impacts accompanying these alternatives and give much more consideration to four lane options and other options that don't simply fuel unsustainable growth in Seattle and the region. Please include our comments in the final DEIS for 520.

Thank you.

John V. Fox Coordinator
Seattle Displacement Coalition
206- 632-0668
4554 12th NE
Seattle, Wa. 98105

From: [Dee Arntz](#)
To: [SR 520 DEIS Comments;](#)
CC:
Subject: Comments on the SR520 Proposal for Lake Washington
Date: Tuesday, October 31, 2006 9:50:48 AM
Attachments: [WSDOTComments on DEIS Proposed Bridge.doc](#)

Mr. Kreuger,

C-020-001

Attached are the comments of the Washington Wetlands Network on the proposed alternatives to replace the sr520 bridge. A major point in these comments are the many fundamental errors in the DEIS treatment of wetlands. If these problems must be corrected and the alternatives reanalyzed. If not, the DEIS as it stands is a dishonest document that cannot serve to give public officials the straight facts to consider the alternatives. Unfortunately, the DEIS now reads like a public affairs piece for the Pacific Street Interchange.

All the 6 lane alternatives are destructive to the environment, however, none more so the the Pacific Street Interchange. With the flawed data and analyses now in the DEIS, it is made to appear that this alternative is environmentally friendly and no substantial damage will done to the wetlands, Marsh Island, Foster Island and the Arboretum. It is not possible to mitigate rare lake fringe wetlands in some other location in the watershed. The damage must be minimized and not maximized with false promises.

Dee Arntz

Chair, Washington Wetlands Network

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Washington Wetlands Network (Wetnet)

Paul Kreuger
Environmental Manager
SR520 Project Office
414 Olive Way, Suite 400
Seattle WA 98101

From: Dee Arntz, Chair, Wetnet
RE: **Comments on DEIS Proposed 520 Bridge Alternatives**

c-020-001 | The purpose of the Draft Environmental Impact Statement (DEIS) is to provide a “thorough” and “objective” identification and analysis effects of the project. This DEIS does not meet either requirement. Many analyses are not included and a great deal of important detail is left out in the DEIS and especially in the Summary. A great deal of key information is buried in the many Appendices. While the inclusion of Appendices is appropriate, it is not appropriate to publish a DEIS *sanitized* of critical environmental impacts.

I believe the information presented below demonstrates that the negative environmental impacts of the project, especially the Pacific Interchange, are greatly underestimated and downplayed. In fact, it appears that one objective of this DEIS was to mislead the Seattle City Council and the public about the real destruction and degradation of wetlands.

My expertise is in wetland protection and advocacy. I started the Washington Wetlands Network in 1990 and this award-winning organization continues to be active in federal, state, and local policy discussions. Also, I graduated from the first University of Washington Wetland Science and Management Certificate Program. So while I have many concerns about the assumptions and analyses in the Draft Environmental Impact Statement, I am confining the majority of my comments to the destruction and degradation of wetlands and the lack of a credible compensation plan.

I support an option that respects rare lake fringe wetlands, and reduces impacts on Marsh Island, Foster Island and the Arboretum. This is certainly not the Pacific Street Interchange. The Pacific Interchange option is a nightmare from the grand old days of unbridled freeway construction, 1950's and 1960's. It has no place in Seattle in the 21st Century.

c-020-002 | **Wetlands**

Overall, the DEIS and its technical appendices consistently minimize the impacts of all options, but particularly, the Pacific Interchange option. On page 3-20 the magnitude of the wetland impact is described –Foster Island, Marsh Island, Union Bay, and the Arboretum. Almost all the wetlands around Lake Washington have been destroyed for development. Now the six lane options will sacrifice most of the rest. The wetlands to be compromised should be characterized as Category I not Category II (see below). Also, the Pacific Interchange Option does not take seriously the abjuration to avoid and minimize as required by law. The Pacific Interchange is not necessary and therefore, can be avoided with an option that supports wetlands preservation and fulfills transportation needs.

c-020-002 | After detailing the important functions of existing wetlands Part I, we are told that these impacts will be mitigated somewhere else. Sadly, wetlands are not like furniture that you just pick and move without consequences. There are consequences that are not fully analyzed. Several of these wetlands are described in the DEIS as “rare”. Also, many wetlands such as those cited in the Fairweather Creek Basin and the Cozy Cove Basin can be upgraded and restored. So can the “impassable culvert” in the Yarrow Creek Basin.

▪ **The DEIS relies on old regulation and policy standards.**

The analysis relies on 1993 City of Seattle regulations even though in 2004 the new regulations that substantially revised wetland categorization were available. City of Seattle Municipal Code (25.09.160) should be applied as City standards for Wetlands Classification and Buffer widths. This would require 200-foot buffer widths for these high value wetlands instead of the 50-foot buffer widths listed in Exhibit 12. Therefore all buffer widths must be revised to show a four-fold increase. Exhibit 13, impacts are given as Category II-IV although the Seattle segment is Category I.

c-020-003 | ▪ **Important discrepancies and inconsistencies occur between the DEIS text and the Technical Appendix E.**

- For example, in text Union Bay wetlands are described as Category II wetlands. This statement contradicts Exhibit 26 in Appendix E-Ecosystems Discipline Report, which identifies these as Category I. This is a huge discrepancy.
- In Appendix E, on pages 73-74, 1600 to 1800 pilings will impact wetlands, but this impact is downplayed. Most puzzling it that the 4-lane alternative has more impacts than the 6-lane alternative
- In Appendix E, Wetland impacts from bridge columns shown in Exhibit 10 for Portage Bay are calculated incorrectly. The impact should be 2,826 feet.
- Exhibit 13 in Exhibit E underestimates the wetland impacts from shading compared to Exhibits 7 and 11 for the original 6 lane alternative (1.3 vs. 6 acres), Pacific Interchange option (1.6 vs., 4.78 acres) and the second Montlake Bridge (1.3 vs. 6.26 acres) claiming that only 20% of shaded wetlands count as impacts. On what basis?
- Exhibit 6 Appendix E Addendum to Ecosystems Discipline Report (EDR) underestimates wetland impacts compared to Exhibit 7 and 11 and Exhibit 23 in the EDR. Also, there are serious inconsistencies between this exhibit and other exhibits for the original 6-lane alternative (6 acre vs. 6.94 acres), Pacific Interchange option (5.3 acre vs. 8.05 acres) and the second Montlake Bridge option (6 acre vs. vs. 7.05 acres).
- Page 51 Appendix E EDR. The proposed 15 storm water cells attached to the bridge columns are not considered direct wetland or lake impacts only shading impacts. In fact, 12 of the 15 cells will displace existing wetlands to create storm water facilities. Maybe 3 of these cells might be considered open water. Also, I see no documentation that this design, which is experimental, actually can effectively treat storm water. It should definitely not be considered wetland enhancement.

c-020-004 | ▪ **Temporary Construction Impacts of four to five + years on wetlands must be accounted for in any compensation plan.** They are not.

C-020-005 | ■ **Estimates of Indirect effects on wetlands due to additional transportation projects are mentioned as possible.** However, no information is presented in the draft EIS main text as to the potential impacts

C-020-006 | ■ **Statements about shading impacts are inconsistent and not substantiated by the scientific literature.**
In discussing Union Bay wetlands, shading impacts by new bridges are considered to be less than existing bridges and structures. However, no citations from scientific literature are given to back up this conclusion. The proposed bridges may be higher, but they will also be much wider which would cause different shade impacts and patterns not necessarily less impact. Overall, the potential effects are not treated in a scientific manner and quantified for comparative analysis. There are no citations to indicate what standards were used, if any. As currently written, these statements should have no more credibility than a hunch.

Further, in Appendix E, Exhibit 10 claims that only a small portion of the shading impacts are considered as impacts for the project. No reason is given.

C-020-007 | ■ **Throughout the document, important negative environmental impacts are minimized or dismissed.** Page 4-32 DEIS the statement is made “the alternatives and options would not negatively affect the quality of life in the project area; in fact, they would increase long term improvements...” This sentence leaves out the negative impact on wetland services and the sheer enormity of the PSI Alternative. Further, the **Key Points, Ecosystems**, there are 4 positive changes and 2 negative. On Page 4-41, Exhibit 4-17 is in error as discussed above. The positive contribution of higher bridges is vastly overblown. The real negatives of the Pacific Street Interchange are given in the last paragraph, Page 5-7 in the DEIS-views from the Arboretum, additional ramps increase the width through Foster Island, two sets of support columns for the Union Bay would encroach on upon existing broad views etc. These impacts are devastating. How can impacts such as these be considered minimal environmental impacts?

On Pages 5-42 through 5-49, the minimizing begins.

- Effects would be fully mitigated to comply with applicable laws and with WSDOT’s policy of causing no net loss of wetland functions and values. This statement is not substantiated in the DEIS nor by historical studies.
- Further, the DEIS states that “compared to the 4 lane alternative, the 6 lane Alternative would be only *slightly* more negative effects because of the larger footprint. This is a value statement that I do not share and don’t believe is substantiated.
- Wetlands – The project has been *designed to avoid and minimize wetland effects wherever possible*. What does that last phrase mean? The DEIS does not document avoidance and minimization especially for the Pacific Street Interchange alternative. This is another case of believing that saying something makes it so. As documented above, all the wetland and buffer impacts have been miscalculated.
- “The Pacific Street Interchange option would have the *smallest shading effect*.” This is another assertion without adequate documentation.
- Page 5-47, DEIS, another case of using language to mislead the reader. The area under the center of the bridge would still be *relatively shaded*, but areas near the edges would *probably* support well-developed plant communities...

- Page 5-48, “The project would reduce the availability and quantity of wetland habitat for invertebrates, amphibians, birds and mammals and would displace a beaver lodge near Foster Island. *However, the area affected is small, and mitigation measures (as described above) would help offset the losses.* Small compared to what. The whole lake; the remaining wetlands?
- The three mitigation measures discussed on Page 5-49 are vague. At this point, the DEIS allows destruction without demonstrating a plan to mitigate.

C-020-007

C-020-008

- **There is no substantive discussion of compensatory mitigation. The document provides only empty promises.** As the findings of the National Research Committee on Mitigating Wetland Losses (2001) concludes that the record of Section 404 of the Clean Water Act in contributing toward the overall objective of restoring and maintaining the quality of the nation’s waters,” is not at all well, and, typically, not at all.¹ Important findings are:

- **Landscape position** of wetlands is critically important to the way in which they function whether naturally existing or restored or artificially created.
- The best way to improve compensatory mitigation results is **to reduce the reliance on it.**
- Chair, Dr. Joy Zedler, and several committee members found that the mitigation program has been fostering a **net loss of approximately 80 percent of wetlands.** The results were published in an article in the National Wetlands Newsletter in 2001.
- **Even with improved compliance, loss of wetlands functions will occur.** In the studies they examined, the authors found “...that only 21 percent of the mitigation sites met various tests of ecological equivalency to the functions lost. These replacement wetlands ranged from 0-67 percent functionality. The compliance rate for these same studies ranged from 6 to 100 percent.”
- **Mitigation banks, the most recently cited panacea for wetland destruction, also have high failure rates.** A study recently completed in Ohio rebuts the widely held assumption that simply pushing more mitigation-to-mitigation banks will improve mitigation success. The study by staff of the Ohio EPA found that “...of the 12 banks assessed in Ohio, 3 were mostly successful, 5 were successful in some areas but failed in other areas, and 4 were mostly failed.” And “[o]f the bank area assessed (nearly 400 ha), approximately 25% was not ‘wetland’ but was primarily shallow unvegetated pond; of the remaining ‘wetland’ acreage, approximately 25% was ‘poor’ quality, 58% percent was ‘fair’ quality and 18% was ‘good’ quality.....” This led the authors to conclude “Too often, mitigation banks have simply meant more acres of poor quality wetland restoration than a comparable, small individual mitigation site.”

The enforcement of permit for compensatory mitigation is seriously deficient. The Corps fails to ensure that compensatory mitigation requirements are met. The 2005 U.S. Government Accountability Office (GAO) Report on Compensatory Mitigation Oversight confirms that the Corps fails to ensure compliance with compensatory mitigation permit requirements.² The GAO Report examined 249 permit files across seven Corps districts and

¹ National Research Council. Compensating for Wetland Losses Under the Clean Water Act. 2001.

² U.S. GENERAL ACCOUNTING OFFICE, PUB. NO. GAO-05-898, WETLANDS PROTECTION: CORPS OF ENGINEERS DOES NOT HAVE AN EFFECTIVE OVERSIGHT APPROACH TO ENSURE THAT COMPENSATORY MITIGATION IS OCCURRING (2005) [hereinafter 2005 GAO Report].

concluded that: 1) while the Corps identifies monitoring reports and compliance inspections as its two most important tools for ensuring mitigation compliance, its guidance on the use of these tools is vague, inconsistent, and weak; and 2) the Corps fails to systematically require and review monitoring reports, conduct compliance inspections, and take enforcement action to ensure compliance with compensatory mitigation requirements.

C-020-008

Based on the studies cited above, no public official can in good conscience accept the glib assurances of compensation. Experience shows that these will not be met. The most reliable way to maintain the few high quality wetlands that remain is to avoid and minimize as required by law. The six lane alternatives as structured especially the Pacific Interchange do not avoid or minimize. By the way, putting vegetated lids over the highways is not mitigation for wetlands and water quality impacts.

I do not believe that the exaggerated benefits and minimized costs, both financial and environmental, of the Pacific Street Interchange justify its selection as the preferred alternative. For heavens sake, the PSI option requires a separate bridge that will directly impact Union Bay (wetland values, Page 3-29 DEIS) Marsh Island and degrade Foster Island and the Arboretum. These impacts are briefly mentioned on Page 3-24 DEIS. Also, the fact that the new interchange is on WSDOT land does not obviate environmental responsibilities. On Page 3-29 DEIS, the evaluation of the PSI Option is discussed. The statement that “equally important is WSDOT’s desire to minimize filling and shading of the wetland, aquatic and shoreline habitats in the Arboretum and Union Bay” is not credible. The only way to achieve this objective is to not do it at all.

There is a tendency in this DEIS to believe that saying something makes it so. It appears that authors think by repeating their concern for the environment on as many pages as possible that will make it so. It is clear from other sections of the DEIS that the only good reasons are economic reasons. On Pages 4-21 and 4-22, the statement is made “the six lane alternative would provide more economic benefit than the 4-lane alternative because it would be much more effective in moving people through the SR520 Corridor.” While this is true, there are seven 6 lane alternatives. Each has its own negative impacts and the PSI has the most.

C-020-009

Financial Considerations

The six lane alternatives are all more costly than the 4 lane and the Pacific Interchange is the most expensive of all. Additional cost of the PSI alternative in Seattle:

- 26.8 acres of land to be acquired vs. 14.1 for the 6-lane alternative.
- Page 8-11, Exhibit 8-8 Construction Duration (1) the Union Bay Bridge adds 24 month, but the exhibit aggregates the PSI option with the “West Approach to the Evergreen Point Bridge.” So there is no way of calculating the added time for the Pacific Street Interchange. How very convenient! And designed to obfuscate.
- Comparative costs are lumped and given in ranges in the Executive Summary on Page ES1-33. So it is impossible to distinguish the costs by option.

C-020-010

Tone and Style

I imagine much of the impetus for this option is also the very emotionally tinged language used to both discuss the present problem and hype the “preferred” alternative. For example, in the Executive Summary:

- Page ES1-2 “the Evergreen Point Bridge and the adjoining stretches of SR 520 are *choked* with traffic”;

- Page ESI-5, “during the peak traffic period, this trip takes an average of 13 minutes.” This statement seems to imply outrage and horror. However, that doesn’t sound too bad when it takes that long or longer to get from Evanston and 62nd Street to the Bartells on 85th Street.

Yes, there is traffic. There are also stretches of I-5 between Seattle and Everett and even on North 85th Street that are chocked with traffic just about every day. So do we decide to use the construction solution as in the era of the 1950’s and 1960’s, perhaps a double decked I-5? Of course not. Such a solution is ludicrous and so are the excesses of some of the six lane alternatives, especially the PSI Alternative.

To sort out the real consequences of each alternative, there should be a grid comparing: (1) the alternative, (2) the cost, and (3) environmental impacts as corrected. Also, in order to make a reasoned conclusion, there needs to be data incorporating transit and conservation options. What about trip management? What about the impact of a toll?

Deirdre Arntz
Chair, Washington Wetlands Network

From: [Chris Leman](#)
To: [SR 520 DEIS Comments;](#)
CC:
Subject: Comments of the No Expansion of SR520 Citizens Coalition on the draft SR520 EIS
Date: Wednesday, November 01, 2006 2:42:20 AM
Attachments:

The No Expansion of SR520 Citizens Coalition offers the following comments on the draft SR520 EIS.

c-021-001 | Format. While the EIS itself is attractively designed, we regret that there is inadequate integration between it and the various appendices that contain much of the data and analysis. The EIS text is often too general to be useful, with the actual data and analysis buried in the appendices. The appendices often include updates that are poorly integrated with the material that precedes them, making it unnecessarily difficult to obtain the overall picture.

c-021-002 | Global warming impacts are not adequately assessed. Increasing the number of SR520 bridge traffic lanes will cause more driving, and hence produce more greenhouse gases. Keeping SR520 at four lanes is the most important single step that our region can take to reduce its future impact on global warming.

c-021-003 | Construction-related traffic is not adequately analyzed and disclosed. SR520 construction will cause huge impacts from truck noise, vibration, dust and pollution, and traffic safety and tie-ups--and building the six-lane alternatives (especially the Pacific Street Interchange) will cause at least a year more of these impacts than the four-lane alternative. There will be tens of thousands of additional trips by fully laden dump trucks, concrete trucks, and other heavy vehicles on City streets. The EIS must provide quantitative measures for this expected truck traffic and its impacts.

c-021-004 | The more comprehensive noise analysis that is needed will show that the six-lane alternatives have noise impacts that are unacceptable yet cannot be mitigated. A full comparison of the noise impacts of the six-lane alternatives versus the four-lane alternative will show that the six lane alternatives cause more 66+ dBA noise above the first floor than the four-lane alternative. Also, for noise impacts that remain under 66 decibels but are still disturbing to the average resident or business, the six-lane alternatives will cause more noise

C-021-004 | increases for more people than the four-lane alternatives. The higher noise from the six-lane alternative than the four-lane alternative will be felt by all neighborhoods that now experience noise from SR520, including not only Montlake, Portage Bay/Roanoke Park, Capitol Hill and Eastlake, but also Madison Park, Laurelhurst, and the Eastside neighborhoods.

C-021-005 | The EIS fails to acknowledge that expanding SR520 to six lanes by adding two HOV/transit lanes will increase single occupancy vehicle traffic. The six-lane alternatives would in fact increase single-occupancy vehicle traffic. because the car-pools and buses that move to the newly built HOV lanes would free up room on the existing lanes, which would be filled by single occupancy vehicles. For a systematic argument that building new HOV lanes encourages single occupancy driving, undermines transit, and harms the environment, see the report on Rethinking HOV which is included in the section, "Building HOV Lanes Doesn't Work," of our web site, www.noexpansionofSR520.org. We do not help transit by making it easier to drive alone, as the six-lane alternative would do.

C-021-006 | Whereas WSDOT's EIS shows the six-lane alternatives with lids at Montlake and Roanoke , the four-lane alternative is shown without these lids, and hence the EIS erroneously claims that four lanes are noisier than six. The EIS did not respond adequately to the City of Seattle 's request in resolution 30777 that WSDOT "pursue all possible measures that promote neighborhood livability with the 4-lane option under study by WSDOT as well as the 6-lane option." It would be entirely feasible to put these same lids on the four-lane alternative, but unfortunately the EIS does not do so. The EIS should re-analyze the four-lane alternative with the lids, because to do so would likely show that its noise impacts would be lower than for any of the six-lane alternatives.

C-021-007 | The EIS does not respond to the City of Seattle's request in resolution 30777 that WSDOT "develop policies that prevent the conversion of HOV lanes and rapid transit lanes to general purpose traffic," and that it "design safety shoulders so that future conversion to traffic lanes is not feasible." Throughout the country, HOV and transit lanes have, once built (and sometimes even on the day they opened) been converted to general purpose lanes; and highway shoulders have been converted to traffic lanes (east of the Lake, the SR520 shoulders have for years been used as HOV lanes, and now the I-90 bridge will be restriped to convert shoulders to create two additional traffic lanes). Without measures to prevent such conversions, the SR520 traffic models and the environmental analysis that depend on them are not worth the paper they are written on, because once built, SR520 is likely to have much more general purpose traffic than was promised in the EIS.

C-021-008 | The EIS noise analysis is seriously misleading in claiming that noise impacts would be reduced under all the build alternatives, because it focuses on a relatively few specific locations that happen to now exceed 66 dBA. As one of many examples, see the statement on page 5-19 that "The noise situation would improve substantially if either of the build alternatives were built." A more accurate statement would be that "Noise walls will reduce noise somewhat for most locations with current noise levels in excess of 66 dBA, but over a much wider area, most locations whose current noise levels are beneath this threshold will experience higher noise levels, but less so for the four-lane alternative than the six-lane alternatives."
from New York City

C-021-009 | As a SEPA document, this EIS should consider a broader range of noise impacts than just a threshold of 66 dBA at the first floor. The State Environmental Policy Act requires assessment of a broad range of environmental impacts, and as a SEPA document, this EIS is not bound to study only noise impacts that can be legally mitigated by federal funds. Many homes and businesses will suffer noise levels in excess of 66 dBA noise levels on upper floors. Many others will experience an increase in noise, even if the increase does not reach the 66 dBA level. Because federal noise mitigation funds are not allowed to be spent for interior residential or office uses above the first floor, or for noise below 66 dBA, it is all the more important to consider the full noise impacts of the various alternatives, because each alternative brings with it a certain level of noise that, because of the federal restrictions, cannot be easily mitigated.

C-021-010 | The EIS fails to propose a "congestion pricing" cross-lake toll level that ensures free flow at rush hour for the four-lane alternative. A rush-hour toll on both the SR-520 and I-90 bridges would manage congestion very well, as has been shown by studies already conducted by WSDOT and the Puget Sound Regional Council; the Mayors "green ribbon" commission also recently urged such "congestion pricing." Yet the EIS fails to study a scenario in which there would be tolls on both the SR520 and I-90 bridges. Because the EIS assumes a toll only on the SR520 bridge, the claim is that I-5 would become clogged as drivers take the free I-90 crossing, and therefore the SR520 four-lane alternative cannot work. But the Federal Highway Administration already recognizes SR-520 and I-90 as jointly constituting a single corridor, and for the purpose of analyzing SR-520 tolls, the EIS should have done so as well. When the SR520 EIS studies the four-lane alternative with congestion pricing tools on both SR-520 and I-90, it will show it to be free-flowing.

C-021-011 | The EIS analysis of the two tolling alternatives does not articulate their dramatically contrasting implications for transportation planning. The alternative

C-021-011 | of maximizing revenue would require drivers to pay tolls at all hours of the day, yet without requiring them to pay a higher rush hour toll. The true “congestion pricing” alternative that was not studied in the EIS could provide a lower or no toll during much of the day and hence take less total revenues from the driving public, but would during rush hour provide a toll high enough to ensure a free-flowing bridge, even with the four-lane alternative. With the maximum revenue tolling option, WSDOT would enter a vicious circle in which it would build and manage highways to bring in more revenue, not for the public interest. Choosing the revenue-maximizing toll alternative could cause WSDOT to overbuild SR-520 with one of the six-lane alternatives, while discounting four-lanes' lesser environmental and neighborhood damage and its fewer years of construction disruption.

C-021-012 | At various points, the EIS is incorrect in describing the Pacific Street Interchange as being community-generated. In fact, an interchange very similar to the Pacific Street Interchange was designed by WSDOT in the mid 1960s (forty years ago) as a part of what was then to be called the R.H. Thompson Expressway. The interchange, and the associated expressway, was de-funded in 1972 by Seattle voters, and was officially terminated in 1977 by the Seattle City Council. The major difference between what was rejected then and the current Pacific Street Interchange proposal is that the original WSDOT design would have been partly underwater.

C-021-013 | The more comprehensive noise analysis that is needed will show that the six-lane alternatives have noise impacts that are unacceptable yet cannot be mitigated. A full comparison of the noise impacts of the six-lane alternatives versus the four-lane alternative will show that the six lane alternatives cause more 66+ dBA noise above the first floor than the four-lane alternative. Also, for noise impacts that remain under 66 decibels but are still disturbing to the average resident or business, the six-lane alternatives will cause more noise increases for more people than the four-lane alternatives. The higher noise from the six-lane alternative than the four-lane alternative will be felt by all neighborhoods that now experience noise from SR520, including not only Montlake, Portage Bay/Roanoke Park, Capitol Hill and Eastlake, but also Madison Park, Laurelhurst, and the Eastside neighborhoods.

C-021-014 | The EIS fails to identify opportunities to reduce costs of the various alternatives. Gov. Christine Gregoire's Expert Review Panel has found the most likely cost of

C-021-014 | the Pacific Street Interchange six-lane alternative to be \$4.38 billion--\$1.59 billion more than the four-lane cost of \$2.79 billion. Governor Gregoire has asked the Expert Review Panel for ideas on how to reduce costs even below that of the current four-lane proposal, and it is regrettable that the EIS offers so little help in that effort, because in many cases a reduction in cost is also a reduction in environmental impact. For example, four lanes are less expensive to build, and can be built more quickly, thus producing a safer and more functional bridge more quickly than the other alternatives. In contrast, among the six-lane alternatives, the Pacific Street Interchange is the most expensive feature and would take the longest to build;. As another example, the Portage Bay Viaduct is proposed for seven lanes in even the four-lane SR520 alternative. Construction over Portage Bay is unusually expensive, and could be substantially reduced by reducing the width of the new viaduct;.

C-021-015 | The EIS should not assume that lanes, shoulders, and ramp geometry would be built to the full FHWA standards The EIS does not explore the possibility of waivers from the federal government,, without considering applications for waivers to reduce the size of lanes and shoulders and ramp geometry. Substantial reductions in all these measurements would dramatically reduce costs, and they should be studied in the final EIS or in a supplemental EIS.

C-021-016 | Transit share on SR520 with the current four lanes is excellent, and could be further enhanced if a future four-lane SR520 were provided reasonable and affordable transit improvements. The SR520 corridor is already the state's outstanding corridor for transit and HOV use, largely because single occupancy driving on SR520 is more constrained. The EIS exaggerates the transit-friendliness of the Pacific Street Interchange, and it fails to explore lower-cost, lower-damage opportunities for improving transit. Elimination of the Montlake flier stop actually degrades the bus opportunities for those who live or work south of the Montlake cut. They will have to walk much further to their buses, and without any real improvement in bus times. Centralizing the bus stops at the light rail station would assist a limited number of people who, in the absence of the Pacific Street Interchange, would simply walk another block or two between their bus and the light rail station.

C-021-017 | The EIS makes the four-lane alternative look bad by depriving it of simple, low-cost measures give buses priority over other motor vehicles. Conversion of one lane of the SR520 bridge to transit or HOV can be a part of the package, and it would be reasonable to convert the entire bridge to HOVs, buses, and trucks only at the peak period. This is a far cheaper and quicker way to achieve transit- and HOV preference than by construction. For the case for converting lanes and ramps to transit- or HOV-only see the report for the Chesapeake Bay

Foundation that I coauthored on Rethinking HOV which is available at www.noexpansionofSR520.org.

C-021-018 | The EIS should explore whether there is any logical need for transit/HOV lanes on the SR520 bridge. So long as buses and car pools have an advantage in getting to and from the bridge, having their own separate lanes on the bridge may not be necessary. More results for transit can be achieved by relying on bus-favoring ramps and shoulders. When the I-90 bridge sank, bus service on SR520 improved rather than degraded, because WSDOT converted an I-5 shoulder to bus only, to make it easier for buses to get to and from the SR520 bridge.

C-021-019 | The more comprehensive noise analysis that is needed will show that the six-lane alternatives have noise impacts that are unacceptable yet cannot be mitigated. A full comparison of the noise impacts of the six-lane alternatives versus the four-lane alternative will show that the six lane alternatives cause more 66+ dBA noise above the first floor than the four-lane alternative. Also, for noise impacts that remain under 66 decibels but are still disturbing to the average resident or business, the six-lane alternatives will cause more noise increases for more people than the four-lane alternatives. The higher noise from the six-lane alternative than the four-lane alternative will be felt by all neighborhoods that now experience noise from SR520, including not only Montlake, Portage Bay/Roanoke Park, Capitol Hill and Eastlake, but also Madison Park, Laurelhurst, and the Eastside neighborhoods.

Sincerely,

Chris Leman, Chair
No Expansion of SR520 Citizens Coalition
85 E. Roanoke St.
Seattle, WA 98133

University District Community Council
c/o 4534 University Way N.E.
Seattle WA 98105

October 24, 2006

Paul Krueger
Environmental Manager
SR 520 Project Office
414 Olive Way, Suite 400
Seattle, WA 98124-4025

RE: SR 520, Comment on draft environmental impact statement

Dear Mr. Krueger:

The University District Community Council ("UDCC") is a voluntary association of residents, businesses, and those who work in that part of Seattle that lies north of the Lake Washington Ship Canal, east of Interstate 5 south of Ravenna Boulevard, and west of 22nd Ave N.E. (but including both sides of it). It overlaps areas with University Park and the Roosevelt Neighbors Alliance. It is open to students at the University of Washington, faculty and staff and many attend its meetings. Both membership and Board meetings are open to the public and held regularly. The subject of SR 520 and its replacement has come up for discussion many times over the years and our membership has reached a consensus. It is set out in the first two sections of this letter.

Preferred Design

The UDCC has long supported repair and/or reconstruction of State Route 520 as necessary for safety purposes. If a new bridge is to be built, new capacity should be limited to "transit only" and bike lanes. Construction should occur within its existing corridor preferably within its existing right-of-way, and environmental impacts on the surrounding neighborhoods (north and south), the Arboretum, and the University of Washington should be mitigated to the maximum extent.

Unfortunately, the draft environmental impact statement ("DEIS") ignores our preferred alternative. The 4-Lane Alternative has no provision for "transit only" lanes, DEIS p. 3-8 thru 3-15, and the 6-Lane Alternative has two HOV lanes, but no transit only lanes, DEIS, pp. 3-15 thru 3-22. Transit only lanes differ from HOV lanes. Transit only lanes can be converted to rail usage; the transit authority can adjust transit only lanes (including directional flow) at rush hours and after major events to serve its convenience. HOV lanes are open to vehicles with two or more persons; legislation proposes to make HOV lanes open to anyone willing to pay a fee; Port districts and others have long campaigned to open HOV lanes for all trucks. Neither now or in the future will HOV lanes offer the flexibility or utility to rapid transit that transit only lanes do. The DEIS should have considered the "transit only" option.

The UDCC strongly opposes the Pacific Street Interchange Option. The DEIS ignores the University Community Urban Center Plan adopted by the City of Seattle after a lengthy neighborhood planning process. Appendix K, Land Use, p. 21 acknowledges that it violates this plan. It truly does. The neighborhood plan goals call for "improved mobility and access by public transportation to service, jobs, businesses, residences, educational opportunities, and other destinations, both within and outside of the UCUC [University District and campus planning area], including local shuttle." (emphasis added). The community and City government recognize that the University District is saturated with the traffic of privately-owned vehicles: the flow is

C-022-002 | almost constant during daylight hours on N.E. 45th St. Traffic is also heavy during extended peak hours on Roosevelt Way N.E. (southbound), and 12th Avenue N.E. (northbound), 15th Avenue N.E., N.E. 50th St., and Campus Parkway N.E.

Sound Transit anticipates building its RTA station in the vicinity of Brooklyn St. N.E. and N.E. 45th St. and establishing a "feeder" system with Metro. Under the "feeder system," until the 65th St. station is built, buses from the north, east, and west would go to the RTA station, rather than to downtown, except for a few express buses during rush hour. This will bring a large number of buses to the University District. Metro planners have said that the UDCC can expect to see the curb lanes of Brooklyn Ave. N.E. from N.E. 42nd St. to N.E. 47th St. reserved for transit use only, and that during peak hours, the curb lanes of N.E. 45th St. will have many more bus routes, buses, and so much added transit use that motorists will be effectively limited to the inside lanes. This will greatly diminish the street capacity for single occupancy vehicles.

The University Community Urban Center Plan set three major goals for the improving local streets: (a) complete the 'Ave' project to widen sidewalks and greenery, making the 'Ave' a place to stroll and shop; (b) bring the University and the University District closer together by reducing the bulkhead along the east side of 15th Ave. N.E., upgrading the streetscape along 15th Ave. N.E., improving the east-west pedestrian connection at N.E. 43rd, 42nd, and 41 St. St., etc.; and (c) reconnecting the University District with the waterfront along the Lake Washington Ship Canal by developing parks, orienting the streetscape to a campus like atmosphere and generally making it easier to cross N.E. Pacific Street on foot. Bicyclists also sought to alleviate the hazard at Campus Parkway on the north side of University Bridge, where cars make right turns directly in front of cyclists at the outside edge.

The Urban Center Plan envisions "mobility" as helping people go where they to within the University/University District by walking or cycling and to destinations outside the University District by public transportation. Heavy vehicular flows on streets impede pedestrian, e.g. at N.E. 45th St. and 15th Ave. N.E., during the hours before morning classes, twenty people may be stopped, standing on the corners waiting for the light to change, while three or four cars are making a left turn; intersections on Roosevelt Way N.E. and 12th Avenue N.E. south of N.E. 45th St. have push buttons designed to make pedestrians wait for a clearance. The Planing Committee recognized that students, other singles, and seniors have cars and use them for dating, hauling goods, getting to late night jobs where bus service is deficient, for recreation, and on the job (e.g. pizza delivery). However, their studies and experience showed that the street system can handle the anticipated traffic volumes off peak hours.

Pacific Street Interchange

C-022-003 | The Pacific Street Interchange clashes with this planning and the long standing efforts to promote public transportation and reduce use of private vehicles. It extols the Pacific Street Interchange as improving the local street network and in its appendices as "improving access to and from the University District." and "reliability." It will add a new connection to the I-5 express lanes and thereby to the exit at N.E. 42nd St. and 7th Ave. N.E. and increase traffic at N.E. 4th St. It will add so much additional traffic to N.E. Pacific Street that its intersection at 15th Ave. N.E. that the DEIS classifies it as "congested." (Level of Service E), DEIS p. 5-23.. That traffic has two main outlets/intakes: westward on N.E. Pacific Street south of the dormitories and thereby impede pedestrian crossings toward the canal front; and north-south on 15th Ave. N.E., setting up a divide between the U of W campus and the University District. Both are contrary to the goals of the Urban Center Plan and the best interests of the University District.

The Pacific Street Interchange will likely increase traffic on N.E. 45th St. and N.E. 50th St. When I-5 is congested at the Ship Canal Bridge --- which happens very frequently --- traffic going to the East side of Lake Washington will get off at N.E. 50th St. or N.E. 45th St. and head for Montlake Boulevard by way of the N.E. 45th viaduct. rather than use the left side off ramp to SR 520. Car and truck radios and routing devices built into late model cars will advise them to do just that to save time. Traffic that now goes over Portage Bay will instead use local streets through the University District and alongside University Hospital --- a poor trade-off. The Pacific

C-022-003

Street Interchange makes the Husky Stadium station a poor place to catch surface buses. The depressed roadway prevents bus pull-outs, and passengers have to walk up to a quarter-mile to the nearest station. As a result, passengers under the other alternatives might make connections at Montlake will instead go to the N.E. 45th St. Station. N.E. to catch surface buses. The transfer points are closer, and the University District Station will have a far better ambiance than waiting near a freeway like ramp. That will increase the bus traffic to the RTA station, and passenger pick-ups by family and friends.

The Pacific Street Interchange does irreparable damage to the University of Washington campus and to the Arboretum. It trisects the campus with Aurora-like arterials, it superimposes a freeway-style interchange with its concrete ramps and bridge over the water sports area on the South East Campus; and it takes almost 15 acres now devoted for educational purposes from the campus. It puts a major interchange in the Arboretum at Marsh Island, converts Lake Washington Boulevard (an Olmsted Boulevard laid out as a park drive) into a freeway access roadway, the only southern access to the Evergreen-Montlake Bridge in Seattle besides I-5; it takes many acres, overshadows more, and dominates the views looking northward as well as spewing noise and air pollution throughout. The University District grew up around the University Campus. It is the largest open space for District residents; it provides jobs for many others; and it is the center of learning for several thousand University students who live here and a beacon of education for many thousand more who attend lectures, concerts, and plays; and, of course, it draws droves of sports fans. Damaging the University campus damages the University District. The Arboretum exhibits the widest range of arboreal species anywhere in the Northwest in a very beautiful and educational manner. Our residents visit for recreation and prize its. The injury that the Pacific Street Interchange does to the Arboretum is a total disgrace. Many district residents and most of the UDCC board members would use much stronger terms.

Ambiance -

DEIS -Inadequate

A committee reviewed the DEIS have many questions that the DEIS and its appendices should answer, but have not done so yet::

C-022-004

Traffic ---

How will the state resolve the traffic congestion the Pacific Street Interchange would create at 15th Avenue N.E. and 15th Avenue N.E.? by more paving? if so, where?

How much additional traffic will occur on N.E. 45th St. and N.E. 50th St. through the University District? What will be its impact? What changes in the street configuration can be expected at Montlake Boulevard N.E. and N.E. 45th St. to accommodate traffic using the viaduct?

Will the Pacific Street Interchange prompt more traffic through the University of Washington Campus on weekends and after hours when there currently no parking attendants on duty? If so, how much?

How much traffic will come off or go on the N.E. 42nd St. ramps to the express lanes? What streets will the traffic use?

Explain in detail the effect of the Pacific Street Interchange on emergency vehicles go to University Hospital both from the Southeast and from the North and West especially in light of the level of service E at N.E. Pacific Street and 15th Avenue N.E.

The DEIS uses figures assuming that tolls continue at the suggested rate forever and makes its environmental analysis accordingly. What would be the range of volumes if tolls come off by 2030, or, if inflation over the next decades, allows users to pay lower value tolls to pay the fixed Costs?

How will the increased buses to the RTA station be handled? Where will the lay over zones be? Will there be bus only lanes? Will parking be restricted?

During the University Community Urban Center planning process, a traffic engineer from the City of Seattle opined that if traffic flows increased N.E. 45th St. and N.E. 50th would be made a couplet of one-wsy streets from I-5 to 15th Avenue N.E.? Would the Pacific Street Interchange make that unwanted circulation pattern more likely?

Will the added traffic on I-5 express lanes increase the noise levels on 7th Avenue N.E.

south of N.E. 45th St. If so, how much?

C-022-004 | The DEIS has no studies on the increased noise on University hospital? What impact will it have? please consider the cumulative noise levels adding in the noise from N.E. Pacific Street, which would be brought closer to the medical center.

C-022-005 | Pedestrian mobility ---

How much added time will pedestrians have to spend waiting for the added traffic to clear up to that they can walk across?

What will be done to prevent right-turning traffic from bullying pedestrians when they finally get a crosswalk light? and to stop left-turning traffic from continuing to turn in front of pedestrians with a "walk" signal? Enforcement against motorists has been non-existent so far. How many added collisions will occur?

What plans are in the works with the Pacific Street Interchange for these two already hazardous situations that it aggravates: (a) the pedestrian crossing of N.E. 45th St. between the bus stop on the south side and the Husky parking and the north side at the traffic signal near the base of the viaduct; and (b) passage Between the bus stop on the north side of N.E. 45th St. and the QFC at the entrance/exit of University Village near the base of the viaduct? Motorists look east for on coming traffic ignoring pedestrians approaching from the west. Eliminating the bus stops is not an acceptable response. Too many University students use those stops.

Will the State retrofit the pedestrian overpass over 15th Avenue N.E. by Schmitz Hall and the Henry Gallery near Campus Parkway to make it accessible by wheelchair?

When the assistant City's engineer proposed the one-way street couplets during the University Community Urban Center planning process, a retired architect responded that it would be better to build pedestrian underpasses in all directions at the intersection of N.E. 45th St. and 15th Avenue N.E. Will that be considered if the couplet concept surfaces again?

C-022-006 | Parking ---

Where will the cars prompted by the "connectivity" that the Pacific Street Interchange envisions be stashed?

What replacement will be made for the parking places displaced from the Husky Stadium lot? What impact does the loss of parking have on the University Hospital, which now relies on them? on friends and family of patients in the hospital?

C-022-007 | Displacement ----

Where will the University acquire the almost 15 acres that the Pacific Street Interchange takes from the campus? It would be very wrong to take the replacement from the west or north, when the major displacement occurs in the southeast. Surely, WSDOT can not expect that the University, to squeeze the expanded enrollment and staff into its existing campus.

Does it serve the public interest for the University to locate more of its research facilities in South Lake Union, a possible replacement site? The University has often insisted that its research be linked to and proximate with its teaching and libraries.

Can property be taken from the parking lots of University Village, the Safeway, and other ownerships north of N.E. 45th St.? Parklands and wildlife refuges should be protected, yet the Pacific Street Interchange makes its entire take on the south. In our opinion, the greenery south of N.E. 45th St. has more value to the public than the parking areas abutting N.E. 45th St. on the north.

If the state builds drainage retention vaults in Montlake Boulevard N.E. and N.E. 45th St., what provision will be made for keeping a continuous flow of Ravenna Creek to University Slough and its wetlands?

What can be expected in the way of detouring traffic through the University District during construction of the Pacific Street Interchange? Please describe in full.

Thank you for the opportunity to comment. We would appreciate receiving a response to

the questions posed.

Yours truly



Matt Fox
President



Queen City Yacht Club

2608 BOYER AVE. EAST SEATTLE, WASHINGTON 98102 (206) 709-2000

RECEIVED

October 25, 2006

OCT 23 2006

SR 520 PROJECT OFFICE

1:40 pm KK

Mr. Paul Krueger
Environmental Manager
Washington State Department of Transportation
SR 520 Project Office
414 Olive Way, Suite 400
Seattle, WA 98101

RE: Queen City Yacht Club Response to SR 520 DEIS

Dear Mr. Krueger:

We thank the Department of Transportation for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the 520 Bridge Replacement Project.

We would like to comment on a number of items in this report that we perceive as impacting our property and comment further on impacts to the environment of Portage Bay. We understand that you have not yet designed this project to any great extent and we hope that you will take these comments into consideration in your design in order to minimize impacts caused by the project.

As discussed in this letter, the Project may have very serious impacts on the Queen City Yacht Club. If our concerns are considered in moving forward with the design however, we believe that many of those impacts could be materially reduced, if not eliminated, without adverse impact on either the cost or the functionality of the Project. Ignoring our concerns may have its own cost implications on the Project. We strongly encourage the Project team to work with us as the design progresses so that the Project can move forward in a manner that is maximally satisfactory to all.

1. Background. Queen City Yacht Club was founded more than 90 years ago, in 1916, making it one of the oldest civic organizations in the City of Seattle. The founding premise was that it was a club for boaters of moderate means, who wanted the sport of boating without unnecessary frills. That attitude has prevailed to date.

Our Club is actively involved in numerous civic activities of importance to the community, as well as providing boating opportunities, social events and recreation for our members and their families. Today we have more than one thousand members.

In 1934, Queen City Yacht Club was able to purchase the property on Portage Bay at 2608 Boyer Avenue East. This unique property has been integral to the growth and development of the Club. The Club's property is irreplaceable, because in addition to owning the uplands, we own the submerged lands on which our moorage is built. These conditions would be difficult if not impossible to recreate anywhere in the Seattle area.

Our Portage Bay facility consists of our main clubhouse, landscaped grounds, paved parking lot and three docks containing 230 mooring slips. The clubhouse is a three story building containing approximately 9800 square feet of improved interior space. It was constructed by our members in the 1930's. In 1999, our members raised more than two million dollars in pledges from our membership to fully renovate the Clubhouse.

Our 230 slip moorage facility was largely built by our members. Our members perform almost all of the maintenance on the moorage. The moorage facility is one of the Club's most significant assets. It not only generates annual moorage rental revenue, but is a significant recruiting incentive for new members to join our club. The moorage at Queen City is known area-wide, as one of the best deals in boating.

Queen City Yacht Club is a non-profit organization which devotes its resources to serving the needs of its members, and providing boating education to the young people in our community. In order to meet its annual expenses, the Club depends upon the revenue obtained from dues from current members, revenue generated by moorage, and the revenue derived from attracting new members. The loss of any portion of our facilities caused by your project will have a severe and material impact on the survival of our organization. The impact from loss of use during the construction of your project could similarly hurt us. Thus we are most concerned about the amount of our property that the Project will require, and particularly its impact on Dock 3, our parking, and the clubhouse.

What we can see in your plans is that in each scenario you have moved your bridge anywhere from sixty to ninety feet north of its present alignment, which moves it directly onto and over our property. This portends the potential loss of our southernmost dock (Dock 3), a portion of our parking lot at least during construction, and a permanent impact on our facility by having the bridge nearer, if not over, our facility. A permanent loss of Dock 3 and significant portions of our parking lot will wreak havoc on both our immediate and long-term finances, and will permanently cripple our ability to regenerate membership which is vital to our long term survival.

2. Consideration of Other Alignments and Properties. It appears to us that significant vacant or less-developed property lies to the south of your proposed alignment all the way from the west shore of Portage Bay to Interstate 5. However, the DEIS does not appear to give any consideration to an alternative alignment to the south, which could use that vacant or less-developed property and spare the Club's property, particularly Dock 3. If a more southern alignment has been considered, the DEIS does not disclose what specific consideration was given and why it is not presented as an alternative in this report.

The DEIS does comment on a desire to "straighten" the portion of the roadway that crosses Portage Bay. However, the diagrams on page ES1-14, suggest that the roadway jogs north at the Queen City Yacht Club, and would be straighter if the roadway were moved to the south, instead of to the north. In any event, the absence of assessing the impacts caused by the decision to move the roadway northward seems to ignore the weighing and balancing process that should be occurring at the DEIS stage.

We ask the State to remember, that you are building the Project in an urban environment where curves and alignments are frequently impacted by the need to deal constructively with project impacts. If there are benefits to the road alignment from it being pushed further north as you propose, those benefits should be compared to the cost and impact, including the impact that by potentially taking Dock 3, the Project may imperil the continued survival of the Club. The public and decision makers should be the ones to decide which impacts are most significant and which impacts should be avoided. But without the information, they can't do so.

The report also does not discuss what alternatives may exist to narrow the bridge at Portage Bay to avoid or lessen the impacts to our Club and to the environment. Is it essential to have full ten-foot shoulders at this location? It appears from the diagram on page ES1-14 that the east and west roadways are separated by some number of feet at the point of the Queen City Yacht Club. Is that truly necessary? Why? Because moving the Project even a few feet to the south could have the effect of preserving Dock 3, it is critical to the Queen City Yacht Club that there be a full consideration of all the alternatives that could move the alignment further south.

The assumed bridge alignment described in your report does not consider whether the existing alignment and right of way of the bridge could be utilized as the permanent alignment for the new bridge by the creative use of traffic detours and construction staging during the construction of the Portage Bay portion. Again, if that would be possible it could result in the maintenance of Dock 3, with significantly lower adverse impacts on Queen City Yacht Club.

C-023-001 | We do not understand why a decision to move the roadway to the north by 60 feet, which clearly causes such damage, is necessary or desirable and see no discussion of the relative value impacts you considered in reaching this decision. Again, because of the lack of detail in your report, we cannot tell what will occur beneath the bridge and whether you intend to pursue design considerations that will restore our facilities after completion of your project, thus mitigating the impacts of the Project on our use. We certainly urge you to do so, and will be willing to work cooperatively and creatively with you to minimize the long-term impact on Queen City Yacht Club, even if the construction impacts are necessarily more significant.

C-023-002 | 3. Actual State Land Needs. The DEIS itself seems to suggest that the Project intends to take all of our Dock 3 lands, although all that may be needed is a construction easement, particularly if the final design occupies a smaller footprint and is located further south. See, page ES2-47. Appendix K, pp. 59-66 is not much more enlightening. We urge the Project team to very carefully analyze whether it can get by with only a construction easement, and to engage Queen City Yacht Club in discussion on how we can access our property during construction and thereafter. As we explained above, a blanket taking of Dock 3 guts the Club's ability to generate revenue and threatens our existence. It is essential that the Project approach the designation of the area to be acquired carefully and with a full dialog with us. Additionally, the report fails to analyze and distinguish the state's actual land needs for construction purposes, as well as its actual needs for land acquisition in perpetuity. The report does not appear to consider or justify a partial construction taking, either, nor has it engaged us in discussions as to how we can access this northernmost portion of our property during construction and thereafter. Further, the report does not consider the impact of its taking on the Queen City Yacht Club's ability to rebuild its dock, or in the alternative, gain access to its property north of the construction zone during the Project.

C-023-003 | 4. Irreplaceable Property. The report's recommendation that the state condemn the Yacht Club's property fails to consider that this taking eliminates an irreplaceable piece of fee-owned aquatic property, one of the few parcels of lake bottom remaining around the Portage Bay, Lake Union and Lake Washington areas that is not encumbered by a DNR lease. Few, if any, options for replacing this invaluable land exist for Queen City Yacht Club. The report fails to consider less intrusive options such as taking DNR parcels of land to the south and positioning the bridge in that direction.

C-023-004 | 5. High Revenue-Generating Property versus Lesser Revenue-Generating Property. Additionally, the report fails to consider the overall economic impact of taking a high revenue-generating piece of property over lesser revenue-generating properties, and even non-revenue generating properties, to the south. In addition to the severe loss of revenue to our club, our long-term financial survival is jeopardized by the loss of existing members who will leave the Club as a result of the loss of moorage. Moreover, our ability to attract new members as existing members die or move away will be crippled by the fact that we will have less moorage available as an incentive to membership. In sum, The Queen City Yacht Club's ability to survive the taking of our property is in serious doubt if Dock 3 is taken.

c-023-005 | 6. Concrete Piling Placement and Access to Property. The report fails to identify construction and design alternatives that would minimize the impacts of the final project on our club.

c-023-006 | 7. Existing and Future Environmental Damage. The DEIS also fails to address the environmental damage created by the existing structure on the sediment levels of Portage Bay. As a long term resident organization on the Bay, our Club has observed that the sediment levels have risen since the construction of the existing bridge. This has steadily made the bay more shallow, diminished water-quality levels in the Bay and made our property less accessible, impacting our ability to maneuver boats within our property and near the existing bridge. The report does not address how the state will remedy the existing sedimentation problem or mitigate and eliminate further silting of the surrounding properties during construction and in the final design of the new bridge.

c-023-007 | 8. Mitigation of Width of Bridge through Portage Bay. The report does not clarify the actual width of the bridge as it passes through the Portage Bay corridor. At present, the report appears to construct the bridge with shoulders that would be appropriate for wide open stretches in eastern Washington, but this design fails to consider narrowing the shoulders and width of the bridge through this area to mitigate harm to the environment and to the surrounding properties. Narrowing the shoulders and overall width would potentially avoid our property altogether.

c-023-008 | 9. Impact on Remaining Property. The bridge designs depicted in the DEIS significantly impact the value of our remaining property, for it builds the bridge nearly adjacent to our newly renovated clubhouse and diminishes the overall waterfront footprint of our property. We would encourage the Project to consider design and construction that mitigates or eliminates these impacts to our facilities.

c-023-009 | 10. Construction Sequence of Bridge. The report is silent on the impact of the construction sequence of the bridge as it relates to the Portage Bay corridor. Moreover, it fails to consider or discuss alternatives that would lessen the impact upon our property. Specifically, the DEIS appears to consider a construction process that fabricates a 30-foot wide temporary construction bridge and a new 60-foot wide bridge all to the north of the existing to allow traffic to flow during construction of the permanent bridge. This method of construction disallows a straightening of the bridge at the west end of the Portage Bay viaduct. This method displaces the greatest amount of private property, especially that of Queen City Yacht Club.

A method that would mitigate the impact to our property would be to reconsider the alignment across Portage Bay to the south, and adopting a construction sequence that uses temporary roadways and detours in conjunction with the existing structure, to minimize impacts on our property. Other construction sequencing alternatives would appear to exist, including building portions of the new structure, diverting some of the traffic onto the new structure and then building the remaining structure.

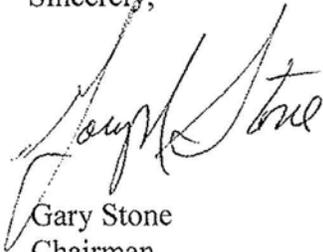
C-023-010

11. Support for Pacific Street Interchange Option. Finally, Queen City Yacht Club values its neighborhood and endorses measures to enhance the quality of life in the Montlake and Portage Bay communities. In concert, we also recognize the importance of a regional transportation solution. Our review of the options as set forth by the state lead us to the conclusion that the Pacific Street Interchange Option improves traffic flow through the Montlake community better than any other option. Traffic is managed at the point of congestion instead of backing up onto the bridge. Additionally, moving more of the traffic off the bridge at a Pacific Street Interchange would enable the designers to look again at the real needs for capacity over Portage Bay.

In conclusion, the state's proposed bridge plan, as depicted in the DEIS, may cripple and materially impact Queen City Yacht Club's ability to exist. The bridge plan further fails to mitigate the impact on revenue-generating property and on the environment.

We look forward to a positive dialogue with your designers, engineers, and land use teams to resolve these issues and make this project a win-win for all parties involved.

Sincerely,



Gary Stone
Chairman
Queen City Yacht Club
520 Mitigation Committee

cc: Robert Yates, Commodore
William McGillin, Vice Commodore
Past Commodore Jeff Ewell, Chairman, Board of Trustees
Elaine Spencer, Graham & Dunn
Scott Grimm, Past Commodore

From: Shannon Boldizar [mailto:sboldizar@bellevuechamber.org]
Sent: Thursday, October 26, 2006 11:36 AM
To: governor.gregoire@governor.wa.gov; Ziegler, Jennifer; Krueger, Paul F; MacDonald, Doug; gdegginger@ci.bellevue.wa.us; ssarkozy@ci.bellevue.wa.us; esser_lu@leg.wa.gov; hunter_ro@leg.wa.gov; tom_ro@leg.wa.gov; weinstei_br@leg.wa.gov; jarrett_fr@leg.wa.gov; clibborn_ju@leg.wa.gov; finkbein_bi@leg.wa.gov; nixon_to@leg.wa.gov; springer_la@leg.wa.gov; reagan.dunn@metrokc.gov; jane.hague@metrokc.gov; kathy.lambert@metrokc.gov
Cc: bnokes@bellevuechamber.org; LeslieL@BellevueDowntown.org
Subject: SR 520 Project DEIS Letter

Governor Gregoire,

Attached is a letter from the Bellevue Chamber of Commerce and the Bellevue Downtown Association related to the SR 520 Bridge Replacement Project DEIS.

Shannon Boldizar
Government Affairs Director
Bellevue Chamber of Commerce
425-213-1203

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October 25, 2006

The Honorable Christine Gregoire
Governor
State of Washington
Legislative Building
Olympia, WA 98504

Re: SR 520 Draft Environmental Impact Statement

Dear Governor Gregoire:

On behalf of the Bellevue Chamber of Commerce and the Bellevue Downtown Association (BDA), we would like to provide comments on the SR 520 Draft Environmental Impact Statement (DEIS) and help guide your decision-making process in selecting a preferred alternative for one of our critical Eastside transportation corridors.

When we met last month to discuss *The Next Washington*, it was no surprise that transportation rose to the top of the list of key concerns for Eastside communities. As you mentioned, we are practically our own economy and consequently, both the Bellevue Chamber and Bellevue Downtown Association are ardent supporters of building a comprehensive transportation system that will move people and freight safely and conveniently through and around Puget Sound's major corridors and urban centers. Our members believe that a balanced, integrated transportation system is critical to our state remaining a vital and competitive global economy and is also an integral aspect to the quality of life we enjoy.

C-024-001

When addressing transportation road projects, our priorities are cost effective congestion relief, increased capacity and general purpose capacity to accommodate future population growth. Both the Chamber and the BDA were disappointed that the 8-lane alternative – the only option that would have accommodated planned future growth – was not fully considered in the DEIS process. Our organizations have long been on record supporting the study of an 8-lane corridor. Now the alternatives before you will do no better than maintain the status quo. It is unfortunate that this option wasn't given the scrutiny it deserves; as a result, our legacy to future generations will be failure to meet their needs.

Polls have shown that the public is willing to support funding for more capacity. Given safety concerns of the structure, current and future traffic patterns, and ongoing traffic delays throughout the corridor, convincing the public that an 8-lane alternative was the wrong option for the region is going to be a difficult task. Studies show that this is critical to both sides of the lake. Traffic volumes are basically balanced with as many commuters traveling to Eastside jobs and vice-versa. We hope you agree that the state should do all it can to accommodate increased traffic on this corridor and urge you to fully incorporate the 8-lane analysis in the DEIS Appendices as project planning moves forward.

C-024-001 | However, with the 8-lane alternative virtually off the table, we do want to be constructive with our comments. Passing the regional transportation package is a priority for our organizations, as is securing funding for the full SR 520 corridor from I-405 to I-5. We urge you and the WSDOT SR 520 team to consider the following provisions:

C-024-002 | **Pontoon Capacity**
It is imperative that the pontoons on the SR 520 bridge be constructed to accommodate at least 30% more capacity – the equivalent of 8 lanes of traffic and future high-capacity transit. While we question the overall feasibility of some high capacity transit modes on this facility, this number should, at the very least, be maintained, if not increased, to accommodate potential future modifications. Lane striping options should also be preserved (similar to I-90) and flexibility for high capacity transit modes such as HOT lanes, Bus-Rapid-Transit, Bus-Rapid-Transit Convertible, along with light rail should be considered during the design and planning phase of the project.

C-024-003 | **Direct Access Routes**
Providing direct access for transit onto SR 520 from Park and Ride facilities, particularly South Kirkland (108th Ave. NE) and Bellevue, should be a key component when planning for the corridor. In addition, a system-wide approach to HOV connections should be incorporated taking SR 520, I-405, I-5 and the University District into account and ensuring that existing levels of transit service are not compromised.

C-024-004 | **Connection to I-405**
To complement funding from both the Nickel Gas Tax and Transportation Partnership Package, project planning should span the entire corridor and carry beyond 108th Ave. NE to I-405. The SR 520 team should work cooperatively with the I-405 team on the braided ramp(s) project connecting both corridors to maximize our tax dollars.

C-024-005 | **Innovative Construction**
You may recall the Access Downtown Project in Bellevue that was completed two years ago. The NE 8th Street overpass was built across I-405 and “rolled” into place, allowing NE 8th – our main artery to the downtown economic core – to remain open. It was originally slated to be closed for two holiday seasons posing a major setback to our businesses. These types of forward, big-picture thinking along with innovative alternatives and construction methods must be integrated into the design process for SR 520. Eastside transportation leaders are innovative and are working on similar projects all over the world. They bring a wealth of knowledge on best practices that should be incorporated in the EIS process.

Further, we encourage the State to establish a core principle during the design phase of the project that ensures flexibility for any potential future modifications and expansion on the entire SR 520 corridor. If potential constraints are not mitigated now, they will only be more expensive and cumbersome to modify over time.

Another key component of the design process is mitigating the impacts of construction. While we recognize that the Legislature mandated transit mitigation during construction, the expectations for traffic flow, facility closures, etc., should be communicated during the early phases of planning so drivers and businesses can plan accordingly for alternative routes and transportation modes.

Chamber/BDA Letter to Governor Gregoire
October 25, 2006

Page Three

C-024-006

Lids, Navigation and Potential Constraints

When planning for lids and navigation, long-term impediments to construction should be reviewed during the design phase so construction can take place with "future potential" in mind to accommodate growth, capacity, transit, etc., along the entire corridor. While lids serve to connect communities, they should not preclude flexibility for future expansion. Consideration should also be given to preserving navigation clearance for watercraft, potential passenger ferry lines and other water-borne modes of transportation. All need to be accommodated without constraint and within the minimum limits established by current regulations.

C-024-007

Tolling

In order to fully fund this facility, toll revenue will be a critical component of the financial equation. Analysis shows that toll revenue would be lower per vehicle on the 8-lane option, yet raise more revenue than higher tolls on the six-lane configuration. Overall, the 8-lane alternative will provide more revenue to fund the facility. In addition, we ask that you maintain support for the state's policy that toll collections be removed once a structure is paid in full. Further, tolls collected on SR 520 should be dedicated solely to this corridor and should be coordinated with potential tolling on other facilities. Over time, we also encourage you to explore how revenue from 520 tolls could be dedicated to implementing an 8-lane facility.

C-024-008

Bicycle/Pedestrian Lane

While we appreciate the need for multi-modal transportation and pedestrian options, priority on the SR 520 corridor should first be given to additional lane capacity. WSDOT cost estimates for the 14-foot wide bike/ped lane are approximately \$90 million. When analyzing the total cost of the overall structure divided by cost per lane mile, the total for the bike/ped lane is closer to \$500 million. Lane costs for mixed-use, two-way traffic should be allocated proportionally with overall lane costs, not separated out. Given the limited funding available on this corridor, constructing a 14-foot bike/ped lane is overkill. Additional lane capacity should be built instead with a significantly reduced width in the bike/ped lane.

C-024-009

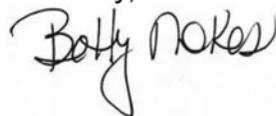
Sound/Noise

Walls to reduce noise impacts throughout the corridor are a vital component in preserving Eastside neighborhoods and quality of life.

We appreciate your recognition of the vulnerability of SR 520. This corridor is a critical component of our economic viability and competitiveness, as well as a valuable asset to our region and our state in terms of capacity and freight mobility. Carrying nearly 102,000 vehicles each day and given the known safety issues, the sooner a decision on a preferred alternative can be made, the sooner WSDOT will be able to move forward with innovative design and detailed cost estimates for the regional ballot measure.

The Bellevue Chamber and the Bellevue Downtown Association commend your leadership on transportation issues and also recognize the challenges that lay before you. We appreciate the opportunity to share our comments and thank you for your consideration.

Sincerely,



Betty Nokes
President & CEO
Bellevue Chamber of Commerce



Leslie Lloyd
President
Bellevue Downtown Association

Chamber/BDA Letter to Governor Gregoire
October 25, 2006

Page Four

c: Paul Krueger, WSDOT Environmental Manager, SR 520 Project Office
Bellevue Chamber Board of Directors
Bellevue Downtown Association Board of Directors
Mayor Grant Degginger, City of Bellevue
Steve Sarkozy, City of Bellevue
Sen. Luke Esser, 48th District
Rep. Ross Hunter, 48th District
Rep. Rodney Tom, 48th District
Sen. Brian Weinstein, 41st District
Rep. Fred Jarrett, 41st District
Rep. Judy Clibborn, 41st District
Sen. Bill Finkbeiner, 45th District
Rep. Toby Nixon, 45th District
Rep. Larry Springer, 45th District
King County Councilmember Reagan Dunn
King County Councilmember Jane Hague
King County Councilmember Kathy Lambert



City of Seattle

Gregory J. Nickels, Mayor

Seattle Transportation
Grace Crunican, Director



October 27, 2006

*Seattle
Freight
Mobility
Advisory
Committee*

Paul Krueger
WSDOT Environmental Manager
SR 520 Project Office
414 Olive Way, Suite 400
Seattle, WA 98101

Peter Whitehead
Nelson Trucking
Co-Chair

Vacant
Co-Chair

Warren Aakervik
Ballard Oil

Pat Binion
Alaska Distributors

Andrew Johnsen
BNSF Railroad

Ed Shilley
NUCOR Steel

Christine Wolf
Port of Seattle

RE: Comments on the SR 520 Project DEIS

Dear Mr. Krueger:

The Seattle Freight Mobility Advisory Committee thanks WSDOT for including us in reviewing the SR 520 draft environmental impact statement (DEIS). We have watched this issue and have had many updates and meetings over this important undertaking. Below are some of the main issues we feel need to be included and/or taken into consideration:

1. Maintaining sufficient through capacity on this route is critical to keeping trucks moving.
2. Keeping vertical heights as high as possible for overhead structures, toll booths and other overhead equipment to accommodate oversize loads being brought to this area of Puget Sound. Oversize routes must be maintained for the Eastside and to access Puget Sound industries and ports. If there are any toll booths, vertical and horizontal clearance should allow passage of an oversize load.
3. Note that the City of Seattle considers a truck design envelope of a 20' X 20' vehicle for overlegal (oversize) loads on major truck routes.
4. Keeping grades as level as possible for maintaining freight mobility, and for visibility, fuel consumption and exhaust emissions reasons. We are particularly concerned about the ramp to the proposed Pacific Avenue interchange. We suggest that grades should be kept to no more than 7%, preferably no more than 5%.
5. Revising the ramp design for the west-bound SR-520 to I-5 merge to make it safer and easier for trucks. Trucks have slower acceleration and deceleration

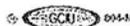
c-025-001

c-025-002

c-025-003

The Seattle Freight
Mobility Advisory
Committee advises
elected officials, SDOT
and other agencies on
measures to improve
freight mobility and safety
in Seattle.

Seattle Freight Program Websites: <http://www.seattle.gov/transportation/freight.htm>
<http://www.seattle.gov/transportation/fmac.htm>



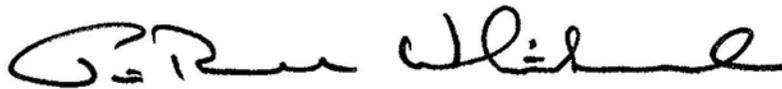
Paul Krueger
Page 2 of 2
October 27, 2006

characteristics. This is of particular importance where trucks merge into traffic at a left hand entrance ramp.

- c-025-004 | 6. Coordination between the Viaduct Replacement Project construction schedule and the SR 520 construction schedule. Minimizing north/south travel congestion at the primary interchanges with SR 520 is critical. Ensure that the two projects (SR 520 and SR 99) will not have concurrent construction underway.
- c-025-005 | 7. Maintaining traffic movement on SR 520 to the extent possible and minimize the time that SR 520 is closed to traffic.
- c-025-006 | 8. The Committee wants to know what the truck design vehicles are for improvements in the project area. Note that the City of Seattle has designated SR 520, I 5, NE Pacific Street and Montlake Blvd NE (SR 520 to Pacific) as Major Truck Streets. The Committee recommends consideration of a WB 67 design vehicle on the Major Truck Streets.
- c-025-007 | 9. All covered roadways and tunnel sections should not negatively impact the transport of hazardous materials.
- c-025-008 | 10. The Committee supports the proposed Pacific St Interchange.

If you have any questions on the Freight Committee's comments, please contact Ron Borowski, SDOT Freight Program at 206 684 8370 or myself at 206 947 6180.

Sincerely,



Peter Whitehead, Co-Chair
Seattle Freight Mobility Advisory Committee

Cc:
Mayor Greg Nickels
Councilmember Jan Drago, Chair Council Transportation Committee
FMAC Members
Grace Crunican, SDOT
Ron Borowski, SDOT
David Allen, SDOT

From: [Midori Dillon](#)
To: [SR 520 DEIS Comments:](#)
CC: [John Hempelmann; gerry@designplus-wa.com; schwab.evan@dorseylaw.com:](#)
Subject: Comment Letter
Date: Friday, October 27, 2006 3:22:11 PM
Attachments: [scan.pdf](#)

Please see attached.

<<scan.pdf>>

Midori Stocker-Dillon

Legal Assistant

Cairncross & Hempelmann, P.S.

524 Second Ave., Ste. 500

Seattle, WA 98104-2323

mdillon@cairncross.com

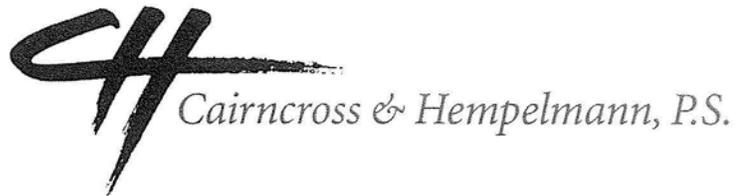
Direct phone 206-254-4401

Direct fax 206-254-4501

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October 27, 2006

Paul Krueger (VIA EMAIL: SR520DEIScomments@wsdot.wa.gov)
WSDOT Environmental Manager
SR 520 Project Office
414 Olive Way, Suite 400
Seattle, WA 98101

Re: SR 520 DEIS Comments on Behalf of Seattle Yacht Club

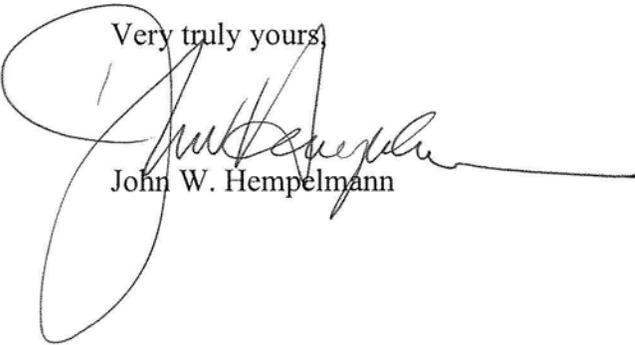
Dear Mr. Krueger:

c-026-001

We are writing to comment on the Draft Environmental Impact Statement for the SR520 project. On behalf of the Seattle Yacht Club, we want to express concern about the potential disruption of access to the dock and moorage facilities. As you no doubt know, the Seattle Yacht Club facilities in Montlake are used by hundreds of members, guests and, at certain times, the public. The Club specifically requests that the Final Environmental Impact Statement address ways to mitigate the probable significant adverse impacts of all of the project alternatives on the Club's facilities.

We would be very happy to work with you and your staff to address these matters. We would be happy to give you a tour of the facilities and provide you with any other information you may find useful as you proceed with the Final Environmental Impact Statement.

Very truly yours,



John W. Hempelmann

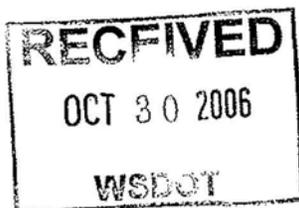
JWH:msd
cc: Seattle Yacht Club

Law Offices

524 Second Avenue, Suite 500
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Phone: 206-587-0700 • Fax: 206-587-2308
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Page 401
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1617 Boylston Avenue • Suite 202 • Seattle, WA 98122 • (206) 329-2336 • Fax (206) 329-2705
info@transportationchoices.org
www.transportationchoices.org

Paul Krueger, Environmental Manager
SR 520 Project Office
414 Olive Way, Suite 400
Seattle, WA 98101

Re: SR 520 DEIS RESPONSE FROM TRANSPORTATION CHOICES COALITION

Dear Mr. Krueger;

On behalf Transportation Choices Coalition, I appreciate the opportunity to submit comments on the 520 Bridge Replacement Project. The 520 corridor is a unique and regionally significant resource in terms of natural environment, community character, and economic opportunity. As an overarching theme, I urge you to take the utmost care in integrating land-use considerations, human and environmental health, and high-quality community design into this project.

In particular, I would like to highlight the challenge we face with climate change. Climate change is no longer a topic of debate: rather, it is our most urgent environmental and social challenge. In Washington transportation is the single largest source of global warming emissions and we therefore cannot afford to build a 520 replacement with a business-as-usual mentality.

The effort to replace the SR 520 Bridge is a singular opportunity to move beyond the status quo – indeed, we must if we want to design a bridge that takes into account climate change, neighborhood disruption, environmental stewardship, and mobility in the face of major population growth.

Please take the following comments into consideration:

Mobility

C-027-001 Any alternative should aggressively maximize the use of transit, active traffic management, congestion pricing and Transportation Demand Management to move people through the 520 corridor.

- WSDOT should provide supplemental information on the 4-lane alternative that includes the provision of transit and HOV lanes on local arterials, a corridor design that maximizes transit use, and the effects of new regional transit and light rail investments.
- The 520 replacement should be built to accommodate future high capacity transit:
 - Pontoons should be constructed to accommodate possible future light rail connections.
 - Height/grade of the 520 facility should accommodate possible future light rail connections
 - The 520 facility should be built to accommodate possible future light rail into the proposed four or six lane footprint
- A 520 Corridor Transportation Demand Management Agreement should be developed with the adjacent 520 cities and major employers to work together to decrease SOV use in the corridor.

C-027-002 A four-lane option with congestion-pricing should be studied.

- WSDOT should provide supplemental information on another 4-lane option that includes a "congestion-pricing" toll that ensures free flow at rush hour for a four-lane option, to provide incentives to reduce SOV use and increase the use Transit/HOVs.
- We urge the studying of tolling on the I-90 bridge to reduce diversion of SR 520 users to another close-by Cross-Lake facility as well as the effect of system-wide tolling on 520 Bridge throughput.

The selected alternative should provide great regional and local bicycle and pedestrian connectivity



- C-027-003
- A chosen alternative should provide connectivity westbound to MOHAI and beyond to Roanoke, north to UW and beyond on Pacific Interchange, south on to 43rd street in Madison Park, and EAST to connect with existing SR520 trail.
 - Connections should be the appropriate height/grade for bicycle and pedestrian use of all levels and abilities.

C-027-004 **Protection of human health**

Provide appropriate mitigation for impacts on human health. Specifically, the chosen alternative should ensure:

- **Noise** – There should be no increase in noise levels and those noise levels should comply with King County code Chapter 12.88, Seattle and Bellevue codes or be mitigated, unless waived by the community.
- **Air quality** – There should be no decrease in air quality from a new bridge or from bridge construction.
- **Water Quality** - There should be no decrease in water quality from a new bridge or from bridge construction. Water quality includes water quantity, stormwater, spill containment, and wetlands.
- **Health Impact Assessment** be made for the alternative chosen. *Health impact assessment (HIA)* is commonly defined as "a combination of procedures, methods, and tools by which a policy, program, or project may be judged as to its potential effects on the health of a population, and the distribution of those effects within the population"

C-027-005 **Lid options should be studied and presented to the community for all alternatives.**

C-027-006 **Protection of the Arboretum and open space**

Any alternative should protect the Arboretum and open space. The alternative selected should not include a Lake Washington Boulevard interchange or an increase in traffic through the Arboretum. In addition, a feasible and prudent option ensures there will be:

- no net loss of publicly held parkland or currently accessible open space in the Arboretum
- no net loss or impairment to the plant collection and wildlife or their future health
- a limited increase of traffic traveling east/west through the Arboretum's wetlands
- no net loss of physical meeting and office facilities for the Arboretum Foundation and the other Arboretum partners' management and maintenance functions
- no net increase to negative intangible conditions (e.g. visual, audio, air quality, light, green space, educational opportunities, or international reputation or significance).

Protection of the natural environment

C-027-007 **Provide adequate mitigation for impacts on plant and animal populations.** Specifically:

- There should be an inventory of all the plant and animal populations, interactions and behavior patterns. Mitigations should be made in light of this ecological assessment.
- There should be a net gain in vegetation, especially trees, based on the inventories noted above.
- There should be no net loss in wildlife and fish based on the inventories noted above. Further, there should be no disruption in habitat migration and breeding areas.

C-027-008 **Select the alternative that most supports good land-use:** The SR520 Bridge replacement project is an excellent opportunity to meet the goals of the Growth Management Act, and selection of the preferred alternative should consider potential impacts and benefits to land use and future development.

C-027-009 **Reductions in global warming emissions.** Supplemental information should be provided to show how we can achieve a net reduction in global warming emissions for each alternative over a 2006 baseline.

C-027-010

Reduction of the footprint of each alternative

The footprint of each of the six-lane options should be drastically reduced. Options should be looked at to drastically limit the existing footprint including:

- Two-lane, bus and HOV-only Pacific interchange. We acknowledge that this severely limits SOV access to the UW but the environmental and aesthetic benefits outweigh this concern. This supports UW's neighborhood commitment to grow without increasing SOV trips.
- Eliminating a Montlake exit/entrance
- Severely reducing shoulder widths and lane widths. WSDOT should consider reducing design speed and vehicle speed on the bridge to ensure safety on narrower lanes as well as maximizing throughput.
- As mentioned in the above mobility section, possible future light rail should be accommodated in the proposed four-lane or six-lane footprint.

C-027-011

Financing

- The region should contribute significantly to financing the 520 project through the Regional Transportation Investment District within its current taxing authority.
- Tolls should be imposed now to start generating revenue for the project.

With this project we have the opportunity to dramatically reshape the direction of transportation and make investments that improve our mobility, health, and quality of life and we appreciate opportunity to comment.

Sincerely,



Jessyn Schor
Executive Director
Transportation Choices Coalition

From: [Preston, Anne](#)
To: [SR 520 DEIS Comments;](#)
CC: ["Jack & Kath Kindred"; "Ron Melnikoff and Cathy Garrison";
"Melnikoff, Ron";](#)
Subject: Comment on 520 Draft EIS
Date: Monday, October 30, 2006 5:49:56 PM
Attachments: [Revised SR 520 Comment Letter.doc](#)

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Portage-Bay Roanoke Park and Fuhrman Boyer Neighborhood Improvement Association Comment Letter SR 520 Draft EIS.

The Portage-Roanoke Park Community Council and The Fuhrman-Boyer Neighborhood Improvement Association (FABNIA) are neighborhood associations that represent the residents of our Seattle community that is located east of I-5 adjacent to SR 520.

Portage Bay / Roanoke Park Community Council was founded in September of 1977. The council has served the community by providing both a forum to discuss neighborhood development issues and as an implementing agent for community improvements. The council has worked recently with WSDOT on the installation of I-5 noise walls on Harvard Avenue, completed a Roanoke Park rehabilitation, and has improved landscaping adjacent to Delmar Drive.

FABNIA is a community Non Profit organization formed in 1995 to work on traffic and community development issues in the Fuhrman –Boyer Street corridor in the Portage Bay – Roanoke Park and Mountlake neighborhoods. We have worked with City of Seattle Parks and Transportation Departments to install street calming traffic circles/ bulb-outs, improve bicycle and walking opportunities and to improve south Portage Bay’s natural areas and recreational use areas adjacent street ends and the Montlake playfield.

Land use in Portage Bay -Roanoke Park and nearby parts of the Montlake Community is primarily single family with some multiple housing along Fuhrman-Boyer and Harvard Avenues. The area’s residential streets plus Delmar, Boyer-Fuhrman and Harvard arterials are used by recreational pedestrians, runners, and bicycle riders (a key leg in the bridge to bridge non-motorized system). Our neighborhood is served by Metro route #25. Increased traffic congestion on Harvard and Roanoke Avenues results in part from their access to and from I-5 and SR 520. Fuhrman/Boyer Avenue has increased traffic speeds and volumes as a result in part from commuters moving east-west from the U-District, Wallingford, and Eastlake to the Lake Washington/Arboretum and Montlake interchanges. Fuhrman-Boyer Avenue and Delmar Avenue East are bisected by SR 520. A review of the Draft NEPA EIS indicates that our neighborhood adjacent to SR 520 will likely have more significant construction and long-term operational impacts than any other residential area

Construction impacts identified in the draft EIS during the estimated 28 month Portage Bay area construction period include:

- Noise from pile driving for the steel support piles needed for the support piers of the 2 temporary and the permanent replacement bridges will affect residences in our neighborhood that are located within 300 feet of Portage Bay (Chapter 4- page 33 and Chapter 8 - Page 18)
- Vibrations from impacting residences from pile driving (Chapter 8- Page 22)
- Dust from Portage Bay, Delmar and 10th Avenue bridge demolitions that will impact nearby areas (Chapter 4-33 and Chapter 8-Page 20)
- Exhaust emissions from construction vehicles (Chapter 8- Page 28)
- Periods of restricted access to homes (and recreational use areas) near SR 520 (Chapter 8-Page 22)

C-028-001

C-028-001

- Closure of Delmar Drive for 9 -12 months for replacement of its SR 520 bridge crossing will funnel traffic onto 11th Avenue which is a narrow, steep residential street and Fuhrman-Boyer Avenue which is the only detour connection to the north and east. (Chapter 8-Page 4 plus information in Transportation Discipline Report).
- Passage of 4 -12 construction vehicles per hour on Furman –Boyer, Harvard Avenues during peak construction periods. (Chapter 8 –Page 15)
- Possible turbidity and pollution problems in Portage Bay (Chapter 8-Page 24)
- Possible slope failure of the hill above Boyer during construction which previously occurred in 1963 during original SR 520 construction at Delmar and 10th Avenue East (Chapter 8 –Page 27)
- Loss of the only residence in SR 520 corridor which is located at 2542 on Boyer Avenue (Chapter 5- Page 33)
- Loss of docks at the Queen City Yacht Club (Chapter 8-20) and The Portage Bay Condominium.

Other construction impacts are not discussed in the draft EIS. They include:

- Possible elimination or service cut-backs of the Route 25 bus service on Fuhrman-Boyer Avenue requiring long walks to Eastlake, Montlake, or 23rd Avenue for other bus access.
- Disruption of bicycle use and walking opportunities of Fuhrman-Boyer Avenue owing to traffic closures and traffic congestion
- Possible access limitations to the Montlake Playfield that includes ballparks, a gymnasium, a summer camp program and adult recreational activities. The ballparks and gymnasium have for several been at capacity for youth and adult soccer, football and basketball programs.
- A projected level of construction noise and vibration that will limit use of the community's street end parks and Montlake Playfield area for both wildlife and human activity.
- Placement of construction barges on Portage Bay that will eliminate or severely restrict recreational boat usage
- Placement of barges and other bridge construction activities will use wildlife usage of the south shore of Portage Bay. This area includes a rare inner city marshland. This area has been frequented by herons, bald eagles, turtles, cormorants and beavers.
- Vibrations along unstable slopes with single-family housing on Fuhrman-Boyer Avenue, Delmar and Roanoke Streets. Homes located on Fuhrman Avenue lost their backyards during the slide season several years ago, and the repairs to the slope cost hundreds of thousands of dollars to repair.

The draft EIS does not list the Montlake Playfield as a possible staging. Area. If it is selected the level of impact would likely even be greater.

C-028-002

Permanent Project impacts identified in the EIS that directly and negatively impact our neighborhood area include:

- Increased shading of Portage Bay (Chapter 9 – Page 8)
- Undefined configuration of conceptual Portage Bay bridge stormwater wetland treatment facility (Chapter 3 Exhibit 12 - Page 41)

- 6-028-002
- Placement of a water quality vault between Boyer Avenue East and the Portage Bay shoreline (Chapter 3 –Page 39)
 - Need for noise walls. (Chapter 5- Pages 19-22)
 - View obstructions of Portage Bay from nearby areas (Chapter 5- pages 2-3)
 - Increase in evening peak hour traffic at E Roanoke/Harvard off ramp with 6 lane alternative (Chapter 5-Page 13)

Permanent impacts that are not specifically discussed in the draft EIS include:

- Lack of any discussion of the proposed project's night lighting and glare
- Street traffic flow changes on our neighborhood arterials including Boyer-Fuhrman Avenue, Delmar, Harvard and other connecting streets to SR 520 access ramps. The existing traffic projections on these streets are included in the Transportation Discipline Report only in areas adjacent to the Roanoke/Harvard intersection. Livability and safety are greatly impacted by speed and volume, and this analysis completely ignores these issues, and instead focuses only on signalized intersection capacities.
- Lack of a full discussion on the project's impact on I-5 traffic congestion. Adding traffic to I-5 may also divert more traffic to Seattle surface streets.
- Possible increase in our neighborhood's noise levels and air pollution owing to increased traffic congestion on connection streets to SR 520 access ramps. Air pollution may also increase if there are more vehicles on an expanded SR 520 east of I-5 interchange.
- Limitations on recreational boat use of Portage Bay after construction of the larger bridge crossing and proposed wetland stormwater treatment facility
- Long term changes in wildlife usage of Portage Bay shoreline area adjacent to Mountlake Playfield
- Recreational use at street end parks and Montlake Playfield

C-028-003

The analysis of significant impacts to our neighbor included in this draft EIS is totally deficient with the exception of noise impacts.

Our neighborhood residents appreciate that the project does include a noise wall as mitigation. Only the discussion on noise wall mitigation appears detailed enough to be fully understandable. We would like its design options to consider the installation of a plexiglas wall. A lighter, brighter and more aesthetic plexiglas wall will preserve views for both motorists passing across the Portage Bay Bridge plus the territorial and distant views of nearby residents. It would allow construction of a lighter, less massive, likely less expensive structure across Portage Bay.

C-028-004

Otherwise, not enough specific information is provided to understand the magnitude of both construction and permanent impacts in just about all impact areas. Many of the reader friendly chapter discussions in the draft EIS discuss multiple topic areas in a manner that is too diffuse and generalized.

C-028-005

Possible best management practices (BMPs) for construction noise, dust, air and water pollution control activities, traffic detour routes and work schedules need more detailed analysis. A plan for monitoring of dust, vibration and noise impacts needs to be included. The plan needs to

- c-028-005 | include mitigation for various levels of impacts. The discussion of BMPs in this EIS does not include necessary specifics.
- c-028-006 | The draft EIS's analysis of permanent project impacts on traffic congestion analysis notes that a specific LOS level of E is forecasted for the six lane alternative at the Harvard/Roanoke intersection. This complex coupling of streets that includes 10th Avenue East, Roanoke, Harvard and Delmar plus a SR 520 off ramp is already a log jam during rush hour periods. The area has also become less safe for bicyclists and pedestrians who need to cross the roadways,. The further decline in LOS requires traffic and safety mitigation that is not specifically discussed.
- c-028-007 | The draft EIS also considers LOS levels of other intersections in this area from A to D as low to moderate and puts them all together as an apparently acceptable level of impact. Intersection delays at levels C and D will cause diversion of traffic to our street corridors. The diversion of traffic into our neighborhood from the University District, Wallingford, Eastlake, and North Capital Hill for motorists seeking I-5 and SR 520 access ramps has been an ongoing impact in our residential neighborhood. All neighborhood intersections need to be analyzed not just those in the Harvard/Roanoke/10th intersection area.
- c-028-008 | I-5 apparently does not have the capacity to handle additional traffic from SR 520. The additional capacity may also result in more traffic being diverted to Seattle arterials that serve our neighborhoods. The increased traffic and congestion may totally overwhelm our neighborhood.
- c-028-009 | There is no discussion on the coordination necessary to provide traffic circulation with the proposed 9 –12 month closure of Delmar Drive East and the undiscussed schedules of closures for the Boyer Avenue and 10th Avenue East SR 520 crossings. The possibility of completing one half of the bridges at a time has not been considered. .
- c-028-010 | The proposed storm water treatment facilities to be located in our neighborhood do not include any estimation of size configurations. The size of the storm water treatment vault on Boyer Avenue may be a significant impact. The innovative but not as yet implemented concept of a storm water treatment wetland at the base of Portage Bay bridge piers also has no information on its possible size or extent. Since treatment areas generally must be at least 1/3 the area of the surface area to be treated, this constructed wetland must be much larger than shown. The relatively large area needed under the bridge for this treatment concept is not evaluated. The size of the storm water facilities along with the increases size of a 4 or 6 lane bridge will significantly impact both the natural habitat of Portage Bay and its recreational use. This may make it impossible to continue our efforts to improve the natural habitat and recreational activity at street end parks and the Mountlake playfield area.
- c-028-011 | There is no specific discussion of the construction impacts affecting wildlife usage of marshland area on the south shore of Portage bay and access limitations to the recreational programs at the Montlake Playfield.
- c-028-012 |
- c-028-013 | The draft EIS also does not discuss the recent vote of the eastside communities to favor the development of light rail service to Bellevue and Redmond via I-90 over further expansion of

C-028-013 regional bus service. The impact of this proposal on regional METRO SR520 corridor bus is not discussed. This development compliments the 4 lane alternative since the additional HOV lanes in the 6 lane alternative may now be considered as a lower public priority whose expenditure may remove funding availability for east side light rail

C-028-014 The draft EIS finally does not provide a thorough review of the tunnel option discussed in Chapter 3, pages 5-6. Without a full analysis of its impacts, dismissing it as too expensive is premature and irresponsible. A comparison needs to be included of its impacts compared to the no-build, four lane and six lane alternatives.

C-028-015 **The lack of specific information also makes it difficult to judge the difference in relative impact of the no build, 4 lane and 6 lane alternatives. It also does not consider any appropriate mitigation.** The extent and severity of construction and post construction operational impacts discussed in this letter will likely force many of our neighborhood residents to conclude that the no build option is the only livable alternative. As noted there is not enough information to determine if we can adequately adjust to the construction and operational impacts of even the four- lane alternative. Our neighborhood residents may accept the four lane alternative if adequate impacts and mitigation information is provided. This may include shrinking the width of the proposed shoulders and placing the bike lane under the Portage Bay Bridge. The only clearly documented advantage of the six-lane alternative for our neighborhood is the proposed lid over SR 520 between 10th and Delmar. We do not understand why the lid also cannot be provided for the 4- lane alternative. Is the inclusion of a lid only for the six lane alternative recognition of this alternative's considerable additional impacts? The difference in extent of impacts created by the six lane alternative as compared to that created by the four lane alternative can not be clearly understood from information provided in the draft EIS.

C-028-017 The severely intrusive impacts of the project's intensive twenty eight month construction period can only be acceptable with an appropriate level of mitigation. FABNIA with the support of the Portage-Bay Roanoke Park Community Council has worked with the Montlake Playfield Advisory Board completing a plan for long-term improvements of the south Portage Bay shoreline area and adjacent sections of the playfield. City of Seattle Parks Department has approved this plan. Appropriate mitigation should consider support for plan elements that include building a walkway connecting the Everett street end with the Montlake Playfield area and providing natural tree plantings in the playfield area adjacent to the Portage Bay shoreline. The walkway will provide a pedestrian pathway connecting the Portage Bay and Montlake communities that will be away from the increasing traffic congestion on Boyer Avenue and other streets.

C-028-018 Another appropriate element of support will be providing funding for additional traffic calming measures along Harvard and Fuhrman-Boyer Avenues. Designs for traffic calming of each intersection on Fuhrman and Boyer Avenue are designed and on file with Seattle Department of Transportation.

C-028-019 We find that this draft EIS does not adequately address the very significant impacts of the four and six lane build alternatives that will impact our community. This draft EIS must be rewritten to include more specific information on impacts and mitigation measures.

Please contact us if you wish to discuss any element of this letter. .

Jack Kindred
President
Portage Bay Roanoke Park Community Council

Anne Preston
President
Fuhrman Boyer Neighborhood Improvement Association

-

From: Pete DeLaunay [mailto:pete@delalaunay.com]
Sent: Monday, October 30, 2006 10:14 AM
To: Swenson, Michael/BOI
Subject: Bayshore Property Comments on SR 520-DEIS

Portage Bayshore Association
2524 Boyer Ave. E. -- Seattle, Washington 98102
www.portagebayshore.org

October 30, 2006

TO: WSDOT SR 520 Project Management

FR: Pete DeLaunay, Secretary, Portage Bayshore Condo-Marina Association
2524 Boyer Ave. E., Seattle, WA. 98102
(www.portagebayshore.org)

RE: DEIS Comments/Mitigation -- Bayshore property and neighborhood

The Bayshore property is located in the Portage Bayshore neighborhood of Seattle -- and just south of the existing Portage Bay viaduct -- on Boyer Ave. E. The Bayshore property is a community of 24 condominium units and 30 moorage slips, 15 of which are located under the building which extends over the water. The building's foundation/marina footings were installed when the building and marina was constructed in the early sixties.

The Bayshore property owners Association represents a condo-marina complex with 40 owners including 24 condo owners/14 with slips, and 16 slip owners. It is administered by a board of directors (www.portagebayshore.org), operating as a non-profit corporation in the State of Washington.

In summary, our immediate comments/ concerns about the SR 520 DEIS are as follows and in no particular order:

c-029-001 | **1. Noise Mitigation** - The draft EIS graphically shows that pile driving needed to install supports for temporary and new bridge piers will create a decibel level of over 100 DBA for a distance of about 300 feet. The Bayshore property is well within 300 feet so we request clarification on construction processes for noise mitigation during construction.

c-029-002 | **2. Bayshore Property Impacts:** There will be dust from bridge removal as well as vibration -- the distance of impact is not discussed ? and needs to be addressed; particularly with the Bayshore construction footprint/ pilings and the impact on the foundation and marina moorings.

c-029-003 | **3. Bayshore Marina Impact/ Access:** The Bayshore property includes 30 moorage slips that accommodate recreational, non liveaboard, boats from 24ft to 40ft in length. While the Queen City Yacht Club moorage impact is discussed, the Bayshore marina is not. Will bridge construction hamper or prohibit access to the marina? With many slips rented, mitigating financial impacts is one of several concerns we have about the SR 520 project on the Bayshore marina.

- c-029-004 | **4. Parking/Boyer Ave. Disruption:** The Bayshore property owners and renters will be impacted by parking, congestion and potential closures of Boyer Ave. With Delmar closed for 9-12 months, increased traffic on Boyer Ave. should be mitigated.
- c-029-005 | **5. Alternatives:** We encourage more study of the tunnel concept? as the most environmentally sound of alternatives explored to date; short of the no-action upgrade maintenance and retrofit as the most cost effective option. Imposing the toll immediately would help raise additional funds that may be needed for more environmentally and aesthetically responsible alternatives.
- c-029-006 | **6. State Environmental Policy Act intentions:** South Portage Bay has long been the refuse area for WSDOT projects over time. Wetlands, species, native plants, salmon habitat have all been affected by highway right-of-way decisions all valid during that time; but until recent times environmental considerations were not a priority. Reclaiming South Portage Bay with removal of silt, invasive plant life, restoration of shoreline (see www.fabnia.org) and better recreational access will provide an important dimension to Seattle's urban quality of life.

Thank you for your attention and response to the issues we have raised on behalf of 40 owners who respectfully request your vigilance to mitigate impacts of the SR 520 project fairly.



October 30, 2006

Paul Krueger, WSDOT Environmental Manager
SR 520 Bridge Replacement Project
414 Olive Way, Suite 400
Seattle, WA 98101



Dear Mr. Krueger:

General Comments

Thank you for the opportunity to comment on the DEIS for the SR 520 bridge replacement project. Seattle Audubon is one of the oldest Audubon chapters in the country started in 1916. We currently represent over 5,500 members and take extreme pride in our mission to cultivate and lead a community that values and protects birds and the natural environment. In fulfilling this mission we strongly believe in seeking balanced solutions to difficult problems, especially in our urban environments.

There is no better example for the need of a balanced and smart approach than when dealing with transportation projects. Most transportation projects bring unprecedented impacts to local neighborhoods, a fact that is undeniable. Most of these impacts are viewed as necessary evils and part of progress. These impacts also usually result in mitigation packages in the millions of dollars. Seattle Audubon strongly believes that we can avoid some of the most damaging impacts that would result through a planning process that deals honestly with all aspects of the transportation project. This honest approach must be holistic and take into account cumulative impacts and more importantly unintended consequences that may result.

We would like to start our letter with three key facts that we believe are undeniable and critical to the SR 520 replacement project.

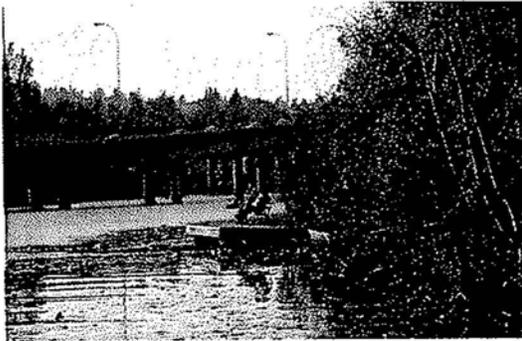
- 1. The SR 520 Bridge needs to be replaced. The safety concerns over Earthquake damage and the potential for catastrophic failure is undeniable.
- 2. There are current areas near the SR 520 bridge infrastructure that provide unique opportunities for people, wildlife and cars to coexist. On any given weekend (rain or shine) there are numerous hikers, canoeists, arboretum visitors, dog walkers, birdwatchers, picnickers and families who visit the area near Foster / Marsh Island and the Arboretum. The Foster / Marsh Island wetland complex is a critical place in the region for wildlife and people. If we value this area we should seek a SR 520 alternative that **avoids** impacts as much as possible rather than **mitigate** impacts to this highly utilized asset.

c-030-001

c-030-002

c-030-003

C-030-003



Nature Viewing Near Marsh Island



Entry to Marsh Island Trail



Canoeing and Walking through Marsh Island Wetland Complex



Wood Ducks in the wetlands



WSDOT Peninsula



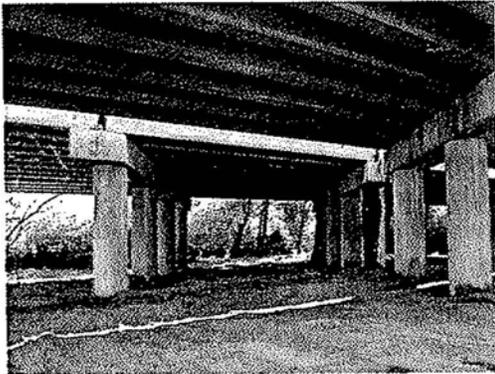
Foster Island Wetland Complex near the Peninsula

C-030-004

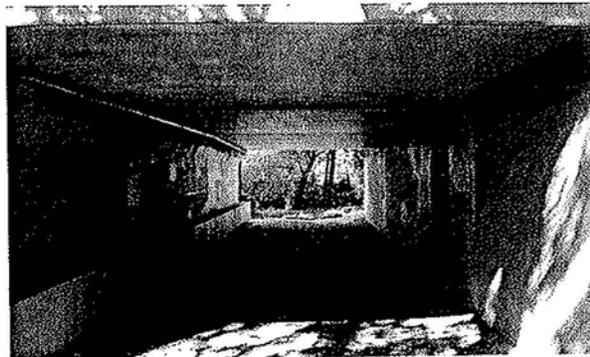
3. No matter what alternative is chosen there will be dramatic impacts to the Foster / Marsh Island wetland complex and the experience of visitors to this regional recreational destination. Nowhere in the DEIS is there a discussion of how this highly visited and important recreational destination will be impacted. This becomes a critical point given the emergence of the Pacific Street Interchange Alternative (PSI) and the dramatic impacts this alternative will have on this entire regional destination.



WSDOT Generated Image of Pacific Street Interchange (PSI)



Existing SR 520 Ramps in Arboretum



Existing SR 520 Tunnel: Main Line

Given the three points above Seattle Audubon strongly suggest the following four action steps. We will elaborate on each issue throughout our letter.

- C-030-005
1. Drop the Pacific Street Interchange Alternative from the list of potential preferred alternatives.
- C-030-006
2. Further research the performance and technical needs of the stormwater treatment basins, the likely impacts from shading, the impacts on Great Blue Heron critical habitat and the true amount of habitat lost as a result of overhead infrastructure. The DEIS does not adequately address these issues.
- C-030-007
3. Develop and discuss a draft mitigation package before a final preferred alternative is locked in. This mitigation must address monetary and maintenance needs for a long-term commitment and success of mitigation measures.
- C-030-008
4. Conduct a complete Section 106 on all historically significant areas and a more thorough investigation of potential impacts to visitors of the Arboretum, Marsh Island, University of Washington Aquatics Center, Foster Island and the pedestrian corridor at Pacific Street. We feel the DEIS does not do an adequate job of determining and discussing impacts to visitors of these critical places.

C-030-009

Our intention in asking for clarification and further investigation on these points is simply to acknowledge that while important the SR 520 bridge replacement project is not a stand alone entity. It is a massive piece of infrastructure that will dominate the scene and impact citizens. The proposed infrastructure will cross over, bisect and permanently remove areas of Foster Island, Marsh Island and currently used green space near the Arboretum. In a truly **context sensitive design** approach impacts to these public areas should be treated with care and sensitivity. According to the Federal Highway Administration context sensitive design is part of the *vital few goal on environmental stewardship and streamlining*.

“Environmental Streamlining drives us to improve project delivery without compromising environmental protection. Environmental Stewardship helps demonstrate that we are mindful of the natural and human environment while addressing mobility and safety needs of the public. FHWA promotes actions that show we are responsible stewards of the environment. We take advantage of opportunities to enhance environmental protection and encourage partnerships that promote eco-system conservation or encourage broader mitigation strategies that seek corridor or watershed based approaches. Environmental Streamlining solutions must go hand in hand with principles of stewardship.” FWHA website, 2006

Context sensitive design is about incorporating new and often massive infrastructure into the existing landscape with the least amount of impact. We are asking WSDOT to take another look at the alternatives with the **context** of the Foster / Marsh Island wetland complex in mind.

C-030-010

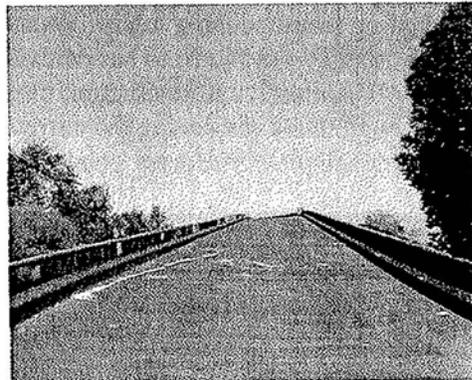
Alternatives

Seattle Audubon has not officially endorsed a single alternative for the SR 520 replacement. We have chosen not to select a single preferred alternative because we believe any alternative is going to have dramatic impacts on the environment in the area. As a result we strongly feel that a significant mitigation package will be needed to ameliorate the unavoidable impacts to the area. This mitigation package must account for not only the habitat lost but also the degradation of the quality of the experience of visitors to the Foster / Marsh Island wetland complex.

Any alternative will add significant width to the existing roadway at various points along the corridor. Land that was previously available for recreation will now be compromised. A replacement of this useable space and experience must be part of the mitigated package. For instance, the images below compare the quality of green space on the WSDOT peninsula before and after the creation of proposed ramps and the changes that will result under SR 520 (mainline) to maintain connection from the Arboretum and the Marsh Island.



Current conditions WSDOT peninsula



Proposed conditions WSDOT peninsula (artist Interpretation)



Current Tunnel ~72 feet



Proposed crossing (artist interpretation)

C-030-011

While Seattle Audubon has not chosen a preferred alternative we are steadfast in our decision to **oppose** the Pacific Street Interchange Alternative. We feel the impacts created by the Pacific Street Interchange on the environmental quality of the Foster / Marsh Island wetland complex will be significant and more importantly **avoidable** by choosing another option. The Pacific Street Interchange Alternative on the surface may be beneficial to traffic impacts to the Montlake neighborhood, but Seattle Audubon does not believe these benefits **outweigh** the environmental and experiential impacts that will be forced upon citizens of Washington and specifically visitors to the Foster / Marsh Island wetland complex. In addition, we do not see enough evidence that the traffic impacts will actually be minimized. How unfortunate would it be if we chose an alternative that severely impacted the Foster / Marsh Island wetland complex **and** did not solve neighborhood impacts either?

Marsh Island, one of the last remaining forested wetlands in our region, would take the brunt of the impacts created by the Pacific Street Interchange. The Pacific Street Interchange would place at least four columns directly on Marsh Island. It would also require the removal of a large portion of the existing vegetation and prevent trees and other vegetation from reaching maturity, due to shading and direct conflicts. The walking trails on the island would have to be removed or be altered to ensure a safe passage under the roadway. The massive infrastructure over the island will dramatically alter the habitat, most likely completely displacing the current populations of birds and other wildlife. The DEIS does not adequately address impacts resulting from the Pacific Street Interchange.



What grows under an overpass and what will Marsh Island look like with one of these bisecting it?

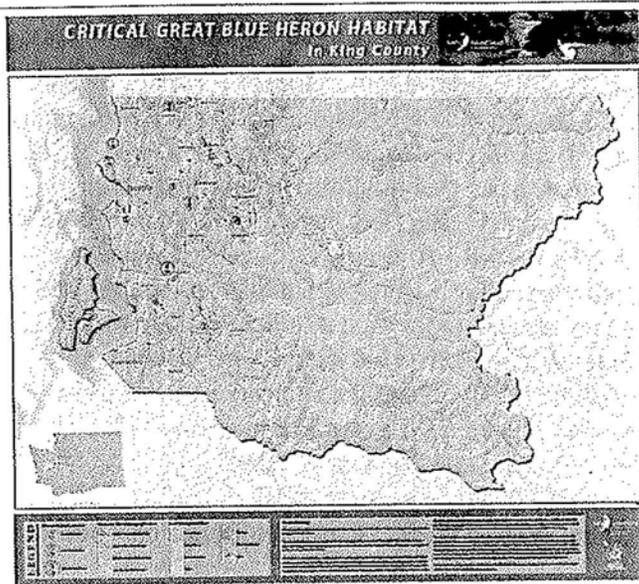
Environmental Impacts

The area around the Arboretum, Foster / Marsh Islands, and the Montlake Natural Area are rich in bird diversity. In the fall and winter you may see hundreds of American Coots floating in the wetlands or catch a glimpse of a solitary American Bittern. The area supports huge congregations of waterfowl as well as smaller groupings of birds and solitary residents. All of this adds up to an extremely diverse complex of habitats. There is no doubt these habitats will be impacted by the SR 520 bridge replacement. However, the DEIS needs to better address how each alternative will impact habitat in the area and what specific mitigation measures would be needed under each alternative. The impacts of the 6-lane, 4-lane and Pacific Street Interchange alternative would have dramatically different impacts on birds and wildlife, but the DEIS only looks at direct wetland filling or vegetation loss. How can an informed decision on a preferred alternative be made without a complete understanding of the environmental impacts of each?

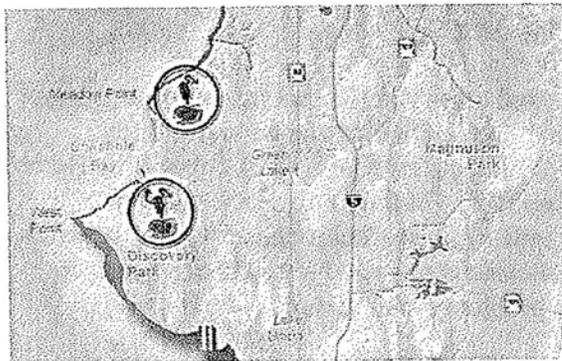
- How will a bridge deck that bisects Marsh Island and shades part of the island impact habitat?
- Vegetation is much more than re-planting. What areas cannot be re-planted because of bridge deck shading? How much habitat is lost because it will be under bridge decks?

Chapter two of the DEIS introduces the birds and other wildlife that frequent the area in and around the SR 520 bridge project. The text highlights Bald Eagles and salmon because of their endangered status. The text also identifies Kingfishers, Great Blue Heron and several other species of birds that are important to our region and use the area. However, the DEIS does not address what impacts might occur to these species, nor does it provide a direct comparison of any of the alternatives as to their potential impacts to birds or other wildlife. This presents a major problem in our view.

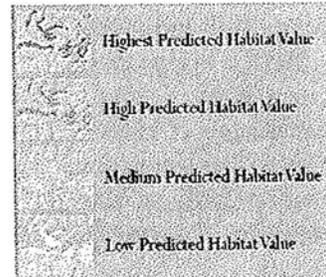
Over the last two years Seattle Audubon has conducted a study on the nesting and foraging habitat of the Great Blue Heron. We have conducted this study in partnership with the Cascade Land Conservancy and CommEn Space to identify the remaining critical habitat of this unique and charismatic bird. Attached is a map of the results of King County and a magnified view of Seattle. As identified on the map there are very few areas of critical habitat for the Great Blue Heron left in Seattle. Two of the most contiguous areas of critical habitat include Foster Island and the area near Discovery Park. SR 520 will potentially impact the Great Blue Heron in significant ways, yet the DEIS does not adequately address this issue. How much foraging area will be lost due to the new SR 520 configuration? What is the likely outcome if the Great Blue Heron is displaced from the Foster Island foraging area?



Seattle Audubon's Critical Heron Habitat Map for King County



Enlargement of Seattle Area Critical GBH Habitat



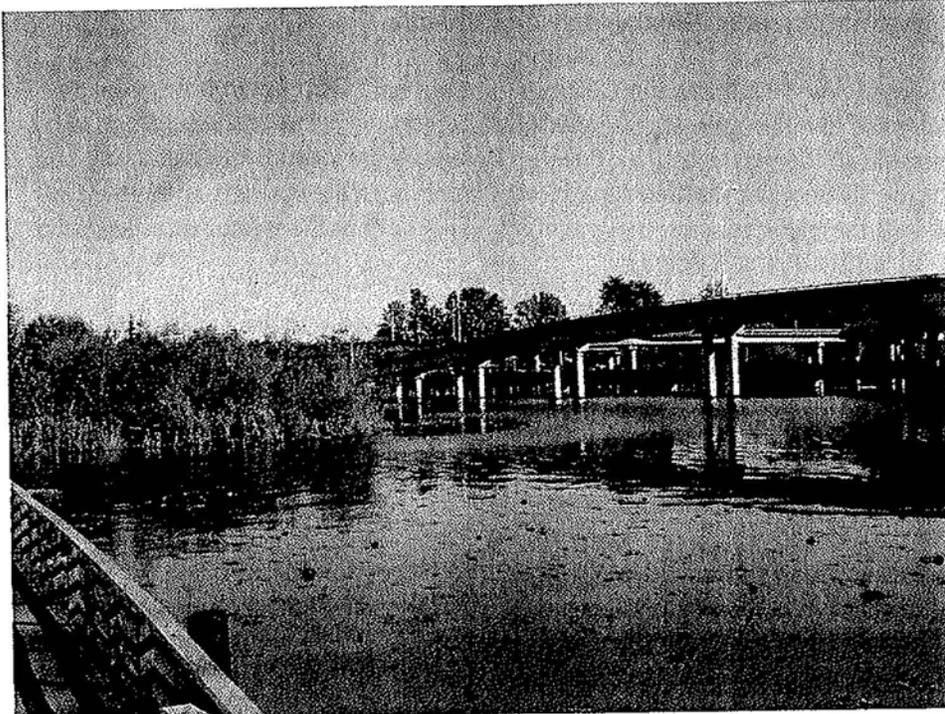
Legend for Great Blue Heron Maps

C-030-013

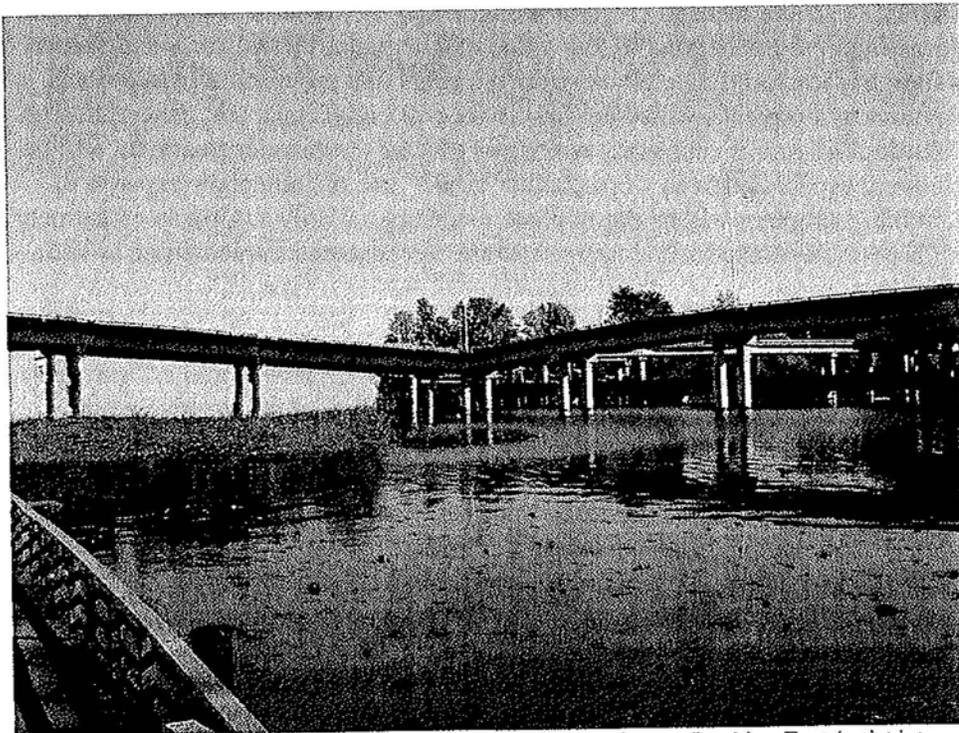
The DEIS focuses on a very narrow definition of environmental impacts. The main discussion admits that the project (any alternative) will fill wetlands and remove vegetation. It is however, quick to point out that filling of wetlands will be kept to a minimum and vegetation will be replanted. This simplistic discussion misses the importance of discussing and understanding habitat, habitat relationships, fragmentation, barriers and other factors that disrupt wildlife life-cycles and the ecological function of the Foster / Marsh Island wetland complex. The questions we need to ask regarding environmental impacts are:

- What wildlife will be displaced, permanently or temporary?
- What changes in habitat will result from vegetation removal?
- How will the increase in road width and infrastructure impact habitat?

We need to ask these questions because the Foster / Marsh Island wetland complex is rich in species diversity and provides unique niche habitat in our urban environment.



Current Conditions: Marsh Island Looking East



Proposed Conditions: Marsh Island with Pacific Street Interchange: Looking East (artist interpretation)

Other Environmental Impacts (Stormwater and Shading)

C-030-014 | The functional details of the stormwater treatment are not sufficient enough to make an informed criticism of the alternatives. No scientific literature is referenced and there is no objective discussion of the performance or design details of the stormwater treatment basins. The unique stormwater treatment basins are small intricate systems at the base of columns. How will the plant material be kept alive, especially in the winter months when the most need for mitigation will occur?

C-030-015 | WSDOT has also referred repeatedly that because the bridge deck will be higher there will be less impacts as a result of shading. Once again no scientific literature is referenced and no quantifiable evidence is provided. The bridge decks will be higher, but they will also be much wider. What are the shading impacts of a wider deck? How many acres of wetlands and land in general will be covered by new bridge decking? How much of this impact is in addition to the current conditions?

C-030-016 | Another critical issue that will dramatically impact the success or failure of environmental mitigation is the commitment of WSDOT in seeing these mitigation elements through to completion. On page 5-6 of the DEIS WSDOT states that "the stormwater treatment wetland could be a positive feature to viewers." It illustrates a constructed wetland of high natural diversity. Indeed this type of wetland would be an asset, but there are numerous studies that point to the need for a long-term monetary and time commitment to ensure wetland creation is successful. It would be just as easy to end up with a stormwater treatment pond of low value that degrades the viewer's experience. Seattle Audubon has learned tough lessons over the years that promised mitigation and aesthetic additions to a project are also the first to receive budget cuts and general design cut-backs. Seattle Audubon is cautiously optimistic that the stormwater treatment will be a positive element, especially given word choice "could" and the monetary expense of this project. What guarantees will be put in place to ensure not only stormwater treatment ponds but all aspects of aesthetics and mitigation are designed and implemented to their fullest?

Cultural and Visual Impacts

C-030-017 | The SR 520 bridge project at the very least will create a wider roadway and considerably more concrete and infrastructure. How will the alternatives impact the experience of canoeists and other recreationalist who utilize the Foster Marsh Island wetland complex? How much of their canoeing experience will be under bridge decks and other infrastructure? How many visitors rent canoes and kayaks each year from the University of Washington Aquatics Center and surrounding outfitters? What will be the experience of visitors to the University of Washington Aquatics Center if the Pacific Street Interchange is selected verses the other alternatives? The quality of the visitor's experience to the Arboretum and Foster / Marsh Island wetland complex has not been considered. This area is a highly used and important recreational area for students, families and the general population of Seattle and the region. This area is also part of the original Olmsted Plan, a historic feature of Seattle. An alternative that solves the needs of moving people must be balanced with preserving the quality of the environment and the

C-030-017

quality of the experience of the Foster / Marsh Island wetland complex. Seattle Audubon does not feel the DEIS has achieved this purpose. We are therefore reiterating our request that a full Section 106 be conducted to review and document the effects of the SR 520 Project on Washington Park and Arboretum, Lake Washington Boulevard, University of Washington Campus and the Foster / Marsh Island recreation area, all significant Olmsted cultural landscapes, which are all eligible for National Register of Historic Places and are adversely impacted by all proposed 520 alternatives. Seattle Audubon also requests to be included as a consulting party to the Section 106 review and any related Memorandum or Programmatic Agreement.

Summary

The four main points of Seattle Audubon's comments are:

C-030-018

1. To ensure that an adequate mitigation package is formed as part of the SR 520 bridge project that addresses long-term monetary and maintenance commitments.

C-030-019

2. Further research and investigation is needed on the performance of the new stormwater basins, habitat impacts to the Great Blue Heron and habitat loss as a result of shading.

C-030-020

3. Seattle Audubon strongly opposes the Pacific Street Interchange. This alternative will dramatically and severely impact Marsh Island and the entire Foster / Marsh Island wetland complex.

C-030-021

4. A Section 106 should be conducted on all historically significant areas and a more detailed documentation of the visitor's **experience** of these areas should be studied. Mitigation for the SR 520 project has to go beyond the 3:1 wetland replacement and examine the quality of life impacts to the thousands of visitors to the Arboretum, University of Washington Aquatics Center and the general areas around Foster and Marsh Islands.

Thank you for the opportunity to comment.

Sincerely,



Matthew Mega, AICP
Urban Habitat Director

CC: Governor Chris Gregoire, Mayor Greg Nickels and Seattle City Councilmembers